

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
)
 vs.) CRIMINAL CASE NO. CCB-21-0334
)
 WILSON NUYILA TITA, et al.,) VOLUME VII
 Defendant.)
 _____)

Tuesday, May 3, 2022
Courtroom 7D
Baltimore, Maryland

JURY TRIAL

BEFORE: THE HONORABLE CATHERINE C. BLAKE, Judge

For the Plaintiff:

Kathleen Gavin, Esquire
Judson Mihok, Esquire
Assistant United States Attorneys

For the Defendants:

For Wilson Nuyila Tita:
David Benowitz, Esquire

For Eric Fru Nji:
Richard Basile, Esquire

For Wilson Che Fonguh:
Glenn Ivey, Esquire

Also Present:

Special Agent Jen Marks, ATF
Special Agent Tonya Matney, HSI

Reported by:

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1 (10:02 a.m.)

2 THE COURT: Anything preliminary or are we ready --

3 MS. GAVIN: Your Honor, I just wanted to make
4 sure -- there are a lot of people in the courtroom today --
5 that none of them are expected to be witnesses.

6 THE COURT: Counsel, are you expecting to call any
7 of the folks in the gallery as witnesses?

8 MR. BASILE: No, Your Honor.

9 MR. IVEY: No, Your Honor.

10 MR. BENOWITZ: No, Your Honor.

11 THE COURT: All right.

12 MS. GAVIN: Thank you, Your Honor.

13 THE COURT: That's fine. Mr. Nji, do you want to
14 resume the stand?

15 MR. BASILE: Yes. The judge wants you to get on the
16 witness stand.

17 (Jury arrives at 10:02 a.m.)

18 THE COURT: You can all be seated. Welcome back,
19 ladies and gentlemen. We're going to be continuing with
20 evidence in the case.

21 THE CLERK: Mr. Nji, I remind you you're still under
22 oath.

23 THE WITNESS: Thank you.

24 C O N T I N U E D D I R E C T E X A M I N A T I O N

25 BY MR. BASILE:

1 Q. Now Mr. Nji, let me ask you, when was the first time that
2 you met Tamufor St. Michael?

3 A. Based on my recollection that was sometime in between
4 November, December 2017.

5 Q. Okay. And before that time had you had any involvement
6 with any of the organizations relating to Cameroonian relief
7 or support?

8 A. Yeah, I'm proud that I'm a community leader of the
9 Nsongwa Development and Cultural Association.

10 Q. And what did you do for that association?

11 A. I was the leader. I work with some of the Nsongwa
12 community members that are here in the United States to get
13 bullet money that we use to provide scholarships to the people
14 from Nsongwa. We provide portable drinking water to the
15 village of Nsongwa. And also extended the electricity so that
16 students studying in the villages would not -- there's kind of
17 a disparity between students that are studying in the city,
18 within the city, from those that are in the villages. So there
19 should be that equality.

20 Q. Okay. And as a result of meeting Mr. St. Michael, did you
21 become further involved in activities regarding Cameroonian
22 relief or assistance?

23 A. Yeah, that was in 2017. I was in Cameroon and then that
24 was when there was a protest between the teachers and lawyers.

25 **MR. MIHOK:** Objection.

1 **THE COURT:** Overruled.

2 **BY MR. BASILE:**

3 Q. Okay, so what was the nature of your involvement after
4 first meeting Mr. St. Michael?

5 A. Um, I was invited in that meeting by Mancho, as I said
6 yesterday, and he was presenting. He has a presentation that
7 he showed us a PowerPoint what he was doing. And I was
8 interested and I told you, I've always been more of
9 humanitarian and I will be supporting all of the humanitarian
10 effort, especially supporting displaced people in Cameroon by
11 the time the crisis started.

12 Q. And you said Mancho PowerPoint. Did Mancho Godlove do a
13 PowerPoint presentation for you?

14 A. No. Mr. St. Michael was the one doing the PowerPoint
15 presentation, but I was invited by Mancho Godlove.

16 Q. I got you. And when you saw this PowerPoint
17 presentation, where did this occur at, what location?

18 A. It was at 10104 Senate Drive in Lanham, Maryland.

19 Q. And that's spelled S-e-n-a-t-e, Senate Drive?

20 A. Senate Drive, S-e-n-a-t-e.

21 Q. And whose house was that?

22 A. That was an office. It was an office. There was a
23 conference room that we were using in the building.

24 Q. Okay. So after you saw this PowerPoint presentation and
25 what -- let me back up. What year was that in?

1 A. That was in 2017. That was between November and December
2 of 2017.

3 Q. All right. So after you saw that PowerPoint presentation,
4 what did you do?

5 A. I brought the idea that I have to create a WhatsApp group
6 for the Kindness, for Kindness. And with that we can
7 coordinate activities to rally money, donation to buy food, to
8 buy clothing, to buy sanitary pads for especially at that time
9 we had -- women were having babies --

10 **MR. MIHOK:** Objection.

11 **BY MR. BASILE:**

12 Q. So you were involved in this humanitarian aid and
13 specifically -- well, did you contribute money to that cause?

14 A. Yes, I contributed a lot of money to that cause, to the
15 Kindness group.

16 Q. Do you recall how much money you contributed?

17 A. I can't recall, but I did regular contributions.

18 Q. Okay, over what period of time?

19 A. I did it for a very long time, right up to 2019, but I
20 did that -- I can't give you a specific date because it was
21 just I was doing money payment, money contributions.

22 Q. And when you would make these contributions, who would
23 you actually give the money to, was it a person or
24 organization or what?

25 A. Yeah, it was going to a Cash App number that was provided

1 to us by Mr. Tamufor at the time. He was actually -- he was
2 one of the admin in the Kindness group.

3 Q. All right. And who controlled that, the Cash App?

4 A. Mr. St. Michael.

5 Q. Who?

6 A. St. Michael.

7 Q. Okay. Now you've seen exhibits showing contributions that
8 you and others made. Do you recall those Government exhibits?

9 A. Yes, I do.

10 Q. And on one of the exhibits at least there was a notation
11 that you were making payments for rent. Do you recall that?

12 A. Yes.

13 Q. And was "rent" a code word or what were those payments
14 designated as "rent," what were they actually for?

15 A. No. At that time there was a need for donation to
16 support the refugees that were in Nigeria. And they showed us
17 pictures of the camps that they were living and temperature
18 was deplorable. So they needed support to have extended
19 accommodation for those who were cramped in small space. And
20 when I provided that, I think as I recall it was \$500 and I
21 put it "rent" because I do have contribution. I always want
22 to make sure that I know exactly what was done with that
23 contribution or that payment that I get out of my account to
24 always denote that. So I was surprised when you said it was a
25 code word, but it was not a code word. That was rent.

1 Q. And it was rent for whom?

2 A. For the -- to provide extended accommodation for the
3 displaced, for the refugees that were freeing the war into
4 Nigeria.

5 Q. All right. And there was also testimony about certain
6 participants having code names and code words being used for
7 certain types of ammunition or firearms. Who made up those
8 code words?

9 A. The code names came -- I can't recall because the code
10 names were names that evolved as the crisis or the war taking
11 place in Cameroon. So we just got into it and those were code
12 words that everybody in the committee knows. It was not
13 something that was provided by somebody. So I cannot provide
14 any specific individual that gave those code names.

15 Q. Okay. And what was your understanding of why code names
16 or code words were being used?

17 A. Yes, they were being used because at the time if you get
18 caught in Cameroon on your phone, they get your phone, you are
19 dead. Either --

20 **MR. MIHOK:** Objection.

21 **THE COURT:** Overruled.

22 **BY MR. BASILE:**

23 Q. Go ahead.

24 A. So the code names were just to ensure that if the French
25 Cameroon military arrest anyone, they will have -- it would be

1 difficult for them to decode that and then you can save your
2 life. But a lot of people have been killed because they didn't
3 use code names.

4 Q. Very well. And so there was also testimony and chat
5 messages regarding Edith Ngang. And do you recall those
6 messages and exchanges?

7 A. Yes.

8 Q. And did you have an issue with something that Edith Ngang
9 had done?

10 A. Yes. There was a video that will -- if I recall, I saw
11 it on Facebook and it was a concern because that was the lab
12 which -- that I also go to. So I was concerned. I didn't know
13 what other additional information that was online. I didn't
14 know who have access to it and you have a lot of French
15 Cameroon spies and they take those names and they send it to
16 French Cameroon officials. And if they -- if I'm part of that
17 which I didn't know at the time, if they can't get me they'll
18 go after --

19 **MR. MIHOK:** Objection.

20 **MR. BASILE:** Your Honor, may we be heard on that?

21 **THE COURT:** Yes.

22 **(Private conference ensued.)**

23 **MR. BASILE:** Your Honor, the facts of these killings
24 and retaliations are already in evidence. It's been testified
25 to over and over again and I don't believe that this gets into

1 any graphic testimony that you have said that we shouldn't get
2 into. So I think this is perfectly admissible and will show
3 his state of mind and the reason for these code words.

4 **THE COURT:** And I agree with that. I think -- I
5 mean, part of what we discussed at the beginning of the trial
6 and that was, of course, before it was clear whether anyone
7 was going to testify, was I did not expect there to be some
8 general discussion of atrocities in Cameroon by an expert or
9 anyone else. I think it's different if you're asking the
10 individual person why they used code words when that is a
11 major part of the Government's case. And I would say that
12 Government witnesses also already have said there was a fear
13 of retaliation. As long as we don't start getting into, again,
14 graphic descriptions or general descriptions of what was going
15 on, but simply state of mind, I'm going to overrule the
16 objection.

17 **(Private conference ended.)**

18 **BY MR. BASILE:**

19 Q. All right, now let me get back to the question I had
20 asked you. What was your concern specifically about the Edith
21 Ngang video that had gotten online? Why were you concerned
22 about that?

23 A. Yeah, I was concerned about retribution from the French
24 Cameroon Government.

25 Q. Now did you work in the lab?

1 A. Yes.

2 Q. When did you begin working in the lab?

3 A. I can't recall, but it's sometime from 2017 to 2019.

4 Q. Did you work in the lab in 2018 also?

5 A. Yes, I did it from 2017 to 2019. So 2017, 2018 and
6 sometime in 2019. I don't have all the specifics, but through
7 that timeline.

8 Q. Now can you tell us what was the physical layout of the
9 lab?

10 A. The lab is just St. Michael's basement and I just -- when
11 I joined the group, prior to going into the lab for six months
12 with Kindness, going at the address in Lanham. And then he
13 invited us for a meeting and that was the first time going
14 there. And the lab is just his basement that is partially
15 under construction at the time. And it has a long hallway
16 where he has his equipment. And then there's another hallway
17 where it's like a toilet that is under construction and then
18 it has a room where it has most of his guns and machines and
19 other items.

20 Q. Okay. And this room that has the -- well, the room that
21 has the guns and the machines, is that a separate room?

22 A. Yes.

23 Q. Okay. Was that room secured in any way?

24 A. Yes. The room was always locked. If St. Michael is not
25 in the basement, then that room is locked. He was the only one

1 who have access to that room.

2 Q. All right. And to your observation do you know if any
3 work was being done in that room?

4 A. Yeah, that was where he was doing most of his work. There
5 was -- I know I saw a 3D machine that he was using because at
6 the time he said that he did gunsmithing, he studied
7 gunsmithing when he was in the Navy. And most of the guns was
8 in that room. So there was a 3D machine that he was using to
9 do his work and then most of his guns were in that room.

10 Q. Okay, you say "most of the guns," were there any guns
11 that you ever observed being outside of that room?

12 A. At times when -- because he knew he orders most of his
13 guns online and they get delivered in boxes. So if we get
14 there sometime, the guns, some were outside, sometimes were in
15 boxes. But there were few times that he displays some of the
16 guns outside from those rooms as well.

17 Q. Who had the key to that room?

18 A. St. Michael did.

19 Q. All right. And there's been testimony about a grinder in
20 this case that was used to grind off serial numbers. And
21 there's a picture of the grinder on the toilet. Did you see
22 that?

23 A. I cannot recall it because I can't recall it, seeing
24 that. I learn of mostly grinder when I started coming to court
25 to listen to testimony.

1 Q. But let me ask you another question about that. Did you
2 see the picture, that grinder on the toilet in court in this
3 proceeding?

4 A. Yeah, I saw the picture. You know, they have a machine
5 that is there and then you have there was --

6 **THE COURT:** Slow down.

7 **THE WITNESS:** I saw there were two machines. One
8 was -- one is this machine that's tiny and then the small one
9 that has the -- (inaudible).

10 **THE COURT REPORTER:** The small one that has the what?

11 **THE WITNESS:** (Inaudible) so that is what I presume.
12 The whole time when they showed Fonguh, that's when I --

13 **THE COURT REPORTER:** I'm not understanding.

14 **THE COURT:** Slow down. Sir, you really need to slow
15 down. Slow down, please. Just slow down. Thank you.

16 **THE WITNESS:** So based on my recollection, I didn't
17 know what a grinder was. That's my recollection, yeah.

18 **BY MR. BASILE:**

19 Q. Let me ask you this. What part of the basement did you
20 work in?

21 A. Well, you get in the basement there's always -- he has a
22 table, a table and where he mound his machines mostly the
23 priming and priming machines for bullet. So I work on that
24 table to when you get in at the end. I think Fonguh described
25 that, so I would always go with him so we would always work

1 together. So I clean some of the shells and hand it off to
2 him to maybe prime it. So we always work close because
3 sometimes one of the -- you have to clean and then you hand it
4 off to somebody to prime. So you need somebody to work in
5 place sometimes.

6 Q. Let me ask you about your job. I think you testified
7 that you were priming. Were you priming ammunition?

8 A. Yes, I was --

9 Q. Stop, let me just ask you now. What did that consist of,
10 priming ammunition?

11 A. Yeah, priming ammunition consists of -- the first part is
12 you have to -- the bullets are used bullets so sometimes they
13 are rusted. So we soak them or spray them or soak them in oil
14 so the rust is going to get off. So there's something --
15 that's plunging, so we use that when we clean the shells and
16 they're plunged with the old bullet out. You put it in the
17 machine to resize it and once you do that, you can prime it
18 back. Sometimes we did the priming, but most of the time we're
19 cleaning the shells and then priming the shells. Most of the
20 time when we went to the lab --

21 Q. When you say "we" --

22 A. I was in there --

23 Q. Stop. Answer my question. Slow down. You say "we," aside
24 from yourself, was anybody else performing that function?

25 A. Most of the time I went with Mr. Fonguh. So that is why

1 why I refer to "we." I always share a ride with him,
2 regularly. And occasionally I would share a ride with Mr.
3 Muma.

4 Q. Okay. And did you have any other job beside priming the
5 ammunition?

6 A. That is what I did. We prime and then we -- he trained us
7 how to prime and then when he order some ammunition, so we
8 would count them for him. So we did that and we would put
9 them together because there were people that came at different
10 times to do that and then keep the rest for us.

11 Q. Okay, who wrapped and packed the ammunition?

12 A. I don't have a recollection on that for those who were
13 packing, but I know Muma was on that team.

14 Q. All right, who wrapped and packed the firearms?

15 A. I know -- I don't have any recollection, but I know St.
16 Michael work with most of the firearms.

17 Q. Were you involved in wrapping and packing the firearms?

18 A. No.

19 Q. Okay. Were you involved in wrapping and packing the
20 ammunition?

21 A. No.

22 Q. Okay. Now there's been testimony regarding -- well, let
23 me back up a second before I get to that. There's something --
24 there's also testimony about a garage. Was there a garage at
25 Mr. St. Michael's house?

1 A. Yeah, there was a garage, but it was out -- there was a
2 garage out of the house. It was a different detachment.

3 Q. Do you know what was kept in the garage?

4 A. Based on my recollection he has a lot of things in that
5 garage, so I don't -- I know he was packing a lot of things. I
6 know you have tires in the garage the few times that he opened
7 it. There were compressors in there that have always been in
8 that garage, so those are the things that I saw the few times
9 that he opened the garage.

10 Q. And you say "when he opened the garage." Was the garage
11 secured?

12 A. Yes, I think he had a code for that so he's always using
13 the code.

14 Q. Did you have the code?

15 A. No.

16 Q. Okay. So you could only get in if he let you in, Mr. St.
17 Michael?

18 A. Yes.

19 Q. All right. Did you ever do any work in the garage?

20 A. No.

21 Q. Did you ever do any work in the vicinity of the toilet
22 where the grinder was located?

23 A. No.

24 Q. Did you ever operate the grinder or do anything to remove
25 serial numbers from firearms?

1 A. No.

2 Q. Did you ever see or hear the grinder being used?

3 A. No.

4 Q. Did you know where the serial numbers were located on the
5 firearms?

6 A. I don't own a firearm. And the first time I saw a real
7 firearm was when I went to Mr. St. Mike's house. So I don't
8 own a firearm, so I don't even know where the serial number
9 was located.

10 Q. Did you ever do any work in your home?

11 A. Yes.

12 Q. What sort of work were you doing at your home?

13 A. Some of the shells I would take them home because I used
14 to live in Fort Washington at the time, so driving from Fort
15 Washington to clean the shells in Baltimore, that was a long
16 drive given that I had two jobs at the time. So I took some
17 home and then he will drop some because he used to work at the
18 Andrews Air Force Base, so he used to drop some off.

19 Q. And how many hours per week would you do work at home?

20 A. I can't recall, because I always do it when I'm free, so
21 I can't recollect.

22 Q. How often would you go to the lab to do work and how many
23 hours a week? If you can recall.

24 A. I went there regularly on Sundays because that is when
25 I'm always free. On some weekdays on federal holidays I would

1 go there when I don't work, so I will go there too.

2 Q. Okay. And when you -- how often when you were there, how
3 many times, if you recall, or how often was Mr. Tita -- excuse
4 me, was Mr. Muma there when you were there?

5 A. I can't recollect how many times because I wasn't keeping
6 record, but the few times that I went with him was mostly on
7 Sundays.

8 Q. You heard his testimony, he said eight out of ten times.
9 Do you have a recollection of that?

10 A. No, that is not true.

11 Q. So there's been testimony about filling up the container.
12 Were you present when the container was being loaded?

13 A. Yeah, I came -- it was -- I came on Saturday when the
14 container was being loaded. I was driving that day, if I
15 recollect, with Mr. Fonguh and Mr. Muma. So we came. The
16 container was already half-full when we arrived, but there
17 were already people there loading.

18 Q. And did you see what it was half-full of, what items were
19 in there? Did you see that?

20 A. Not quite. I saw -- when I came they was putting a truck,
21 I think it was a Tundra truck at the time when I came. And
22 then when the truck got in and we had parked some of the
23 barrels that had medications that we had that was going to
24 Nigeria to the refugees, we had sanitary pad, like I said, it
25 had baby food, it had some food as well, clothing and then

1 when that was pulled there was some baby chairs that also was
2 outside. And then I didn't stay that long because I was
3 working that evening from 6:30 to -- 6:30 p.m. to 6:30 a.m.

4 Q. Okay. Did you -- during that period of time, what was
5 your work schedule like?

6 A. During that time I was working -- I was supporting the
7 Security Exchange Commission, SEC. I was a security engineer
8 there. I worked from 6:30 p.m. to 6:30 a.m., Thursday, Friday,
9 Saturday and sometimes every other Wednesday, because it's
10 like 12-hour shifts.

11 Q. So when you got to the site where the container was, did
12 you see what, if anything, was in the two Toyota vehicles?

13 A. No. I recalled based on my recollection, at the time I
14 knew you had one vehicle in the container because like we
15 said, we heard from testimonies, Mr. Akem did not inform us
16 that there were two vehicles in the container. So we came
17 there, the container was parked and then they put the second
18 car. And it was later on that I learned that there were two
19 cars in there.

20 Q. Okay. So what items did you load into the container?

21 A. Like I said, I loaded barrels, I supported to put in
22 chairs in the container.

23 Q. What were in the barrels?

24 A. Like I said, you had medication, you have baby food that
25 were going to the vulnerable people that were refugees in

1 Nigeria.

2 Q. Okay. Now when you began working at the lab, did there
3 come a time when you knew or realized that the ammunition and
4 the firearms, as well as the humanitarian items, that they
5 were being shipped to Nigeria?

6 A. Yes. I knew it was going to Nigeria because in the Zoom
7 meeting it was discussed in the Zoom meetings, some of the
8 Zoom meetings that I attended.

9 Q. Okay. And at what point did you realize what the
10 destination was for all of these items?

11 A. I can't recollect, but I know that they had it in a
12 conversation to send a container to Nigeria. So I can't really
13 recollect.

14 Q. All right. Now did there come a point in time when you
15 had a discussion with Mr. St. Michael regarding his licenses
16 to ship these items?

17 A. Well, the first time we was with St. Michael, like Mr.
18 Fonguh said yesterday, testified yesterday, he had so many
19 guns. And we were asking him, how do you get so many guns?
20 He says, he's in the military and he has license that, he is
21 collecting all of that. And then also, he said when we saw him
22 doing the bullet, he was making his own bullet because he goes
23 to the range and he said yeah, so he has license that cover
24 everything that he does. So we knew everything that he does
25 there's a license, he has it documented. I think to be exact

1 he said paperwork for everything he was doing.

2 Q. Okay. And when he said he had licenses to do everything
3 that he was doing, what did you interpret that to mean as to
4 what activities were licensed?

5 A. I knew if you been a military guy and with that kind of
6 experience and doing what he was doing, I would believe that
7 you have -- you can't be doing those things if you don't have
8 the right document. So I knew everything that he was doing in
9 his basement, printing the guns or whatever he was doing was
10 legal.

11 Q. Did you have any reason to believe that any of those
12 activities were not licensed at that time?

13 A. No.

14 Q. And you said "we." There was a conversation -- when I
15 asked you about the conversation that you had with Mr. St.
16 Michael on that issue and you said that "we" had a
17 conversation, who else was a part of that conversation besides
18 you and Mr. --

19 A. I was there, Mr. Fonguh was there in that instance. But
20 Mr. St. Michael has mentioned that several times in the
21 presence of others. So when I say "we," it's always at the
22 present when based on my recollection, Mr. Fonguh was there.

23 Q. Okay. And you said something about several conversations.
24 Were you present when there were other conversations about
25 that licensing issue?

1 A. I know one -- based on my recollections, I know he has
2 mentioned that more than one time.

3 Q. Okay. And who was present when he mentioned that more
4 than one time on the other occasions?

5 A. Based on my recollection, Mr. Tita was present and Mr.
6 Fonguh was present.

7 Q. Okay. Did you have any discussions with Mr. St. Michael
8 about what Mr. Bangarie was doing?

9 A. No, Mr. Bangarie? No, not -- no, not based -- based on
10 my recollection.

11 Q. Okay. And did you have any knowledge as to what Mr.
12 Bangarie's role was, if any, in the shipment of these items to
13 Nigeria?

14 A. Yeah, I know Mr. Bangarie, he's -- he has a shipping
15 business so I know he has all the -- for you to have a
16 shipping business they are required that you have all the
17 requirement that you should. So he has a business, so I know
18 he -- I just know that he's a shipping -- he own a shipping
19 business. That's all I know.

20 Q. Now let me ask you if you know about the finances. Who
21 spent the monies for the ammunition, the firearms, all of the
22 other articles that were being shipped to Africa? Who
23 actually spent the monies for those purchases?

24 A. To the best of my knowledge it was always Mr. St. Michael
25 and to some instance -- I just know it's Mr. St. Michael.

1 Q. Okay. Were you involved in purchasing any firearms or
2 ammunition?

3 A. No.

4 Q. Okay. What about Mr. Akem? When did you first meet Roger
5 Akem?

6 A. I met in person was in October of 2018. That was when I
7 met him in person, the first time I was meeting him in person.
8 But I know -- yeah, that was the first time I met him in
9 person.

10 Q. Did you ever meet -- and where did that meeting occur?

11 A. It was at St. Michael's basement, which is also called
12 lab.

13 Q. Okay. Did you meet Mr. Akem at any times after that time?

14 A. Yes. The second time based on my recollection was when
15 he came for a fundraiser at Mr. Fonguh's house. So that was
16 when I met him the second time.

17 Q. Okay. Did you meet him a third or fourth time?

18 A. Yeah, so yeah, he came the first time and then I think
19 there was a second fundraiser that he came. And during the
20 loading I met him. So roughly I met him between four to --
21 four to six times, but I can't give a specific because I
22 wasn't keeping --

23 Q. To your observation, what was his role, if any, in the
24 activities that were being carried on by Mr. St. Michael?

25 A. I know -- I know he coordinate -- he was the -- based on

1 the information, I know that he was head of -- used to call
2 him HOD, Head of Defense for one of the self-defense groups
3 that is helping to provide resources to vulnerable people to
4 defend themselves from the carnage that's going on in
5 Cameroon.

6 Q. And let me ask you, you know what the Peanut group is, do
7 you not?

8 A. Yes, I do.

9 Q. Can you tell us from your standpoint, your understanding,
10 what is the difference between Kindness and the Peanut group?

11 A. Yeah, the Kindness group was specifically to raise money
12 to buy -- to provide pay for hospital bills for the wounded in
13 Cameroon, to take care of those who had -- that had gotten
14 destroyed and they had to reconstruct them, to provide I will
15 repeat again, sanitary pads to women that were using grass in
16 the bushes. Also, to support women who were giving birth in
17 the bushes.

18 Q. Okay. And what about the Peanut group?

19 A. The Peanut group was -- that came about I think when
20 Rogers met St. Michael. And St. Michael came to introduce
21 that, pitch that into the Kindness group that when -- at that
22 time the killings, a lot of people were being killed and it
23 was very traumatizing and very difficult. And when he pitched
24 that -- and that was, if I recall, it was in February because
25 me and Mr. Fonguh, he's my cousin, we have a birthday almost

1 the same day. During every birthday the month of February, I
2 donate all the money that I earned from February, I go to DC
3 and I provide that money for February to the homeless.
4 Sometimes I buy card and then I --

5 **MR. MIHOK:** Could we have the next question, please?

6 **THE COURT:** Could we redirect, please?

7 **BY MR. BASILE:**

8 Q. Let me focus you on the Peanut group. If you can tell
9 us, what did the Peanut group do?

10 A. Peanut group was a pitch when we were doing the
11 fundraiser to raise money to support the sufferings of the
12 Southern Cameroonians that were being displaced. So he said
13 you cannot only focus on humanitarian. And then he pitched in
14 that we should be talking about self-defense because we were
15 really having massacres.

16 **THE COURT:** Self-defense. Next question.

17 **MR. BASILE:** Thank you, Your Honor.

18 **BY MR. BASILE:**

19 Q. Now there's been testimony that the Government has
20 introduced, exhibits regarding a PowerPoint presentation. Do
21 you recall seeing that yesterday?

22 A. Yeah.

23 Q. Stop. Wait for the next question. Who prepared that?

24 A. I did.

25 Q. Okay. And why did you prepare it? For what purpose?

1 A. Yeah, I prepared it because St. Michael wanted me to help
2 him prepare PowerPoint because that is one of the things that
3 I'm good at. So I said okay, I will prepare the PowerPoint.
4 So he sends me some pictures to prepare PowerPoints for him to
5 present during the fundraisers.

6 Q. Okay. And, in fact, were they used to present at
7 fundraisers?

8 A. Yeah, he did.

9 Q. Did you have any involvement in fundraisers other than
10 preparing the PowerPoint document?

11 A. I participated in the fundraisers and I created the
12 PowerPoint for him.

13 Q. Now there's been a lot of testimony about the secrecy
14 involved in these operations and I think you even -- there was
15 even a chat message yesterday about secrecy. Can you tell us,
16 did you regard your operations as being secret?

17 A. Yeah, the -- when you talk about war, when you have war,
18 you have somebody that looks for --

19 **THE COURT:** Can we --

20 **BY MR. BASILE:**

21 Q. Just a second. It calls for yes or no. Did you regard
22 your operations as being secret?

23 A. No.

24 Q. Well, if that was the case, why was there talk about
25 secrecy and concealment? What were you -- I think there was a

1 message about concealment. What were you concealing and why?

2 A. I wasn't -- I don't have a recollection, but I wasn't
3 part of the concealment team. They had people who were doing
4 concealment, but I know they were doing that because they
5 wanted to ensure that when those items get to Cameroon and
6 those -- the authorities in Cameroon will not identify because
7 if they get that, the person who has it is going to be killed.

8 Q. Okay.

9 A. Or the family members will be killed.

10 Q. Did you have any concern or desire to conceal this
11 operation from the U.S. Government?

12 A. No.

13 Q. Okay. Now there was a chat message on October 26, 2018 in
14 which you wrote, "We are progressing. For the past few nights
15 since Monday I go to sleep at 2 a.m. Just last night I primed
16 500 Gnut peelings. If we can go to the lab daily there are
17 some things we can take home and process to push the work, but
18 it should happen only to those who have private areas in their
19 homes. I will be making calls to make sure we have more work
20 done this weekend, God bless." Did you send that message?

21 A. Yes.

22 Q. And why?

23 A. Yeah, at the time there was -- I think if I recall, based
24 on my recollection there was a massacre where a lot of people
25 were killed. And the way I tried to -- when I see those

1 killings, the only way I can internalize the trauma and the
2 challenges and the difficulties is to do those things because
3 that's how I overcome when you see people killed. So since I
4 couldn't be -- I couldn't go to the lab regularly so I have to
5 take that home. And then I have to clean it private because I
6 don't want to expose where my kids will get access to. So
7 that's why I use that, use a secure place in your home because
8 we are not, we are not -- we are not having -- bullet is not
9 something that -- seeing it is traumatizing so you don't want
10 your kid to see.

11 Q. Okay. On March 25, 2019 you sent a message in which you
12 stated, "Great job. Let yous between now and end of April to
13 have 10 plus sticks ready to call Nsongwa, Bafut and Chomba to
14 come for a blessing ceremony. It should be a fundraising event
15 on May 26th." What did you mean by that message?

16 A. So yeah, at this time like I said, community --
17 communities were putting resources together for Southern
18 Cameroons in the United States and around the world to help
19 defend some of the groups that were protecting the vulnerable
20 people in the communities from being massacred or being
21 maimed.

22 Q. Now there was another message, April 17, 2019 from you
23 which, said "Comrades, Commander Wal and I completed a
24 consignment yesterday and it need to be dropped. I informed
25 Commander Kool this morning. He promised to make arrangements

1 for it to be dropped. Please update the team on the progress.
2 We all have to create time and get things done in the lab.
3 Ghost is carrying everything on his shoulder. Let's step in
4 to assist to keep encouraging him. If he breaks down we will
5 also fail."

6 Now let me ask you about that message. What is a
7 "consignment"? What did you mean by "consignment"?

8 A. Consignment was just maybe barrels of medications,
9 barrels packed with medication, food for baby food, canned
10 food and other items, that sanitary pad, soap that the
11 displaced people in Cameroon would need. Like I said, we're
12 more concerned with those who are dying in the bushes,
13 especially those who had gunshot wounds.

14 Q. Let me ask you, besides -- you testified about this
15 container that you helped fill and send out, were you involved
16 in any way in any other shipments or containers that were
17 being shipped?

18 A. No. The way the lab was operating which I don't have all
19 the details, you have people who were involved in shipping.
20 And that was mostly controlled by St. Michael, Rogers, and
21 Bangarie. So I don't know how those -- so we just do it and
22 they do the rest, so I don't have full details.

23 Q. Okay. And so from that answer did you -- did you ever
24 load any other shipments besides the one that has been
25 testified to?

1 A. I can't -- when I go there for all the time that I went
2 there, I put -- few times I put consignment together for the
3 same item that we talked about. That's the most, based on my
4 recollection.

5 Q. Okay. Now you have seen a copy of your indictment in this
6 case, have you not?

7 A. Yeah, I've seen it.

8 Q. Okay. And in the indictment there are references and
9 quotes from various chat messages that you were alleged to
10 have sent. Have you read those?

11 A. Yeah, yes.

12 Q. Okay. And, in fact, did you send those chat messages?
13 Were those accurate?

14 A. Yes, all the chat messages on the WhatsApp group I did
15 send them out.

16 Q. So you're not denying the content and the fact that you
17 sent those messages, are you?

18 A. No, I'm not.

19 Q. Now you were present when Mr. Muma testified were you
20 not?

21 A. I was.

22 Q. And I asked him about when he was a student of yours and
23 was he a student of yours?

24 A. Yeah, he attended training sometimes 2017, 2018 for
25 almost a year.

1 Q. Okay, and did he sign a contract to take this course from
2 you?

3 A. He did.

4 Q. Okay. And he said that the blanks in the contract were
5 not filled in when he signed it. Is that true or false?

6 A. No, he's lying.

7 **MR. MIHOK:** Objection.

8 **THE COURT:** He's saying it's not true.

9 **THE WITNESS:** It's not true.

10 **BY MR. BASILE:**

11 Q. All right, and what was the tuition that he agreed to pay
12 you?

13 A. At the time it was \$3,000 that everybody was paying.

14 Q. And how much of that did he pay?

15 A. He paid \$300.

16 Q. All right. And does he still owe you any money?

17 A. Yes, he owe -- he still owe about I think \$2,700.

18 Q. And have you made efforts to collect that money from him?

19 A. We have an accountant that will call students that need
20 to make the payments, so I know they made several calls to
21 him.

22 Q. Okay. And we had shown him an exhibit which was the
23 contract. Was that, in fact, the contract?

24 A. Yes.

25 Q. And did you sign that contract?

1 A. I think the administrator, the school administrator
2 signed the contract with him.

3 **MR. BASILE:** Okay, Court's indulgence. And Your
4 Honor, that's all the questions I have.

5 **THE COURT:** All right, thank you. Let's see, Mr.
6 Mihok.

7 **C R O S S - E X A M I N A T I O N**

8 **BY MR. MIHOK:**

9 Q. Good morning, Mr. Nji.

10 A. Good morning.

11 Q. I'm going to ask you questions. Unfortunately, some of
12 them are going to sound similar to the questions I asked Mr.
13 Fonguh yesterday. Let me start though with if you're familiar
14 with a WhatsApp team or WhatsApp group called Response Team.
15 Do you recall that?

16 A. I recall that was Mr. Akem added me to a group called
17 Response team.

18 Q. And do you recall who else was in that group?

19 A. Based on my recollection, I don't.

20 Q. Let me pull up Exhibit 37. We'll just highlight the top
21 part there. Do you see the second number down? That's you,
22 right?

23 A. Yeah, that's my number.

24 Q. And then right above you, Mr. Tita, that's his number?

25 A. Yes.

1 Q. And Mr. Bangarie?

2 A. Yes.

3 Q. Mr. Rogers Minisoter, who is Mr. Akem?

4 A. Yes.

5 Q. And then the Ghost who is Mr. St. Michael, correct?

6 A. That's correct.

7 Q. And if we go down a little bit, thank you. The Response
8 Team was formed March 28, 2019. Do you see that?

9 A. I see that, yeah.

10 Q. And if we go to the next page at the top, Mr. Akem,
11 Rogers Minisoter writes: "I just created our Think Tank
12 captioned Response team." Do you see that?

13 A. Yes.

14 Q. So this was in response to the news that that shipping
15 container had been rerouted and was headed back to Baltimore,
16 correct?

17 A. I can't recollect. I didn't create the group, so I can't
18 recollect if that was the reason.

19 Q. Well, do you acknowledge being a member of this group?

20 A. I was added to the group, but I'm on the group, but I
21 didn't give my -- so I was just added to the group without my
22 -- I was just added to the group.

23 Q. You were added to the group, but in the very next message
24 isn't that you saying "thanks," writing "thanks"?

25 A. Yeah, because they added me, I thought, or I was stunned,

1 hoping to understand what the group was because in most cases
2 when they are adding a group, they describe why you get added
3 into the group, but I didn't see that. So I just -- at times
4 I was waiting for the next -- but being a busy person, that
5 wasn't something that was -- when I came here I even saw that
6 there was a group that was called Response group, but that
7 wasn't something I knew of.

8 Q. Well, let's go to the very next message. And the very
9 next message reads: "It has been confirmed that all sea
10 routes are heading to Baltimore." Do you see that?

11 A. Yes.

12 Q. And this was approximately a little over a minute and 10
13 seconds -- a little over a minute from when you replied
14 "thanks." Do you see Mr. Akem, Rogers Minisoter, "All sea
15 routes are heading to Baltimore." Do you see that?

16 A. Yes.

17 Q. What did you take that to mean?

18 A. Um, I don't know. Mr. Akem probably is going to provide
19 answer for that because he created that and he wrote that. So
20 how do you -- I can't explain that because I didn't write
21 that.

22 Q. Okay, and then let's go down to the last entry on that
23 page. You see Mr. Roger's Minisoter, Mr. Akem and this is two
24 minutes after you wrote "Thanks. Plan B is activated." Do you
25 see that?

1 A. Yes.

2 Q. And what does that mean?

3 A. I can't recollect.

4 Q. Can we go to the next page and at the top there we see
5 the Ghost indicating "copy," correct?

6 A. Yeah, I see that.

7 Q. And we see your confirmation, delivered and read, the
8 second one there. Do you see that?

9 A. Yes. When you are in a group and they send a message, it
10 goes to everyone. So it doesn't -- if you're familiar with
11 WhatsApp, messages in a group goes to everyone. So I don't
12 know how -- how this means. So messages go to everyone and it
13 came to me because I was added to that group.

14 Q. Do you recall a meeting being set up for this Response
15 team/Think Tank to discuss something?

16 A. Yeah, they set up -- I know a meeting was set up, but
17 they said -- they said they wanted to meet in person,
18 something like that, but I couldn't attend the meeting because
19 I had emergency. So I was -- I think I was at work, so I
20 didn't attend.

21 Q. Well, the messages on the bottom are a series from Mr.
22 Akem. "We need to talk. Look at your schedules for Sunday."
23 Do you see those messages, April 1st?

24 A. Yes.

25 Q. And then the next page, do you see "setting up the

1 meeting for 5 p.m." And how do you respond?

2 A. Yeah, so I said I was open for 5 p.m. because that was
3 when based on my schedule, I would be available. But at the
4 end of the day I didn't attend the meeting because I had an
5 emergency, so --

6 Q. And do you recall there if we go down to the bottom, are
7 you familiar with this address, 1516 Chapel Hill Drive,
8 Rosedale?

9 A. Um, I can't -- I didn't know the address. I don't know if
10 I've been there, but I don't live in Baltimore, but it's an
11 address here in Baltimore.

12 Q. Have you ever been to that address?

13 A. Based on my recollection, I don't think so.

14 Q. And this is from Mr. Akem who he's from Minnesota,
15 correct?

16 A. Yes.

17 Q. And this is a location for the meeting that's proposed
18 for Sunday, right?

19 A. I think so.

20 Q. What's that?

21 A. I hope -- maybe.

22 Q. And do you recall if there was an effort for you to join
23 this meeting by phone or Zoom?

24 A. No, I don't recall. Based on my recollection I don't
25 recall joining a meeting.

1 Q. Well, let's go to the next page. And if we go to the
2 message in the middle there, please. Do you see on April 7,
3 2019?

4 A. Yes.

5 Q. And you wrote, "safe trip, see you soon. Learned meeting
6 is at 1 p.m. I will not be available physically but can join
7 by phone."

8 A. Yes, because I was letting him know that I will not be
9 based on work and at the end of the day I didn't recall
10 joining the meeting by phone.

11 Q. Well, and who are you saying "safe trip" to?

12 A. That was Mr. Akem. He was coming here for the meeting,
13 but since I could not and I said it there I was working, he
14 was coming to Maryland for a meeting for whatever reason. So I
15 can't provide details because he didn't provide the agenda
16 because the meeting always have agenda. So he didn't provide
17 that. And I wasn't present, based on my recollection.

18 Q. Well, let's go to the next page. And the bottom there,
19 message. Do you see on April 7, 2019 you wrote, "I will attend
20 5 p.m. Please confirm."

21 A. Yeah, because you look at the time I was telling them I
22 might -- based on work I might be available at 5, but based on
23 my recollection, I don't think I attended the meeting.

24 Q. And so based on your recollection you don't -- looking at
25 these documents it hasn't refreshed your recollection about

1 whether or not you were at a meeting around April 7th in
2 response to the Response team Think Tank?

3 A. I don't recollect because time has passed. I don't
4 recollect.

5 Q. Don't recall it.

6 A. No.

7 Q. The container not being delivered in Nigeria, you learned
8 of that, correct?

9 A. I know I had -- I knew there was a Zoom meeting, that
10 somebody in the Zoom meeting made mention of a delay and that
11 the container was coming back here. I don't know who said
12 that. But I know the response to that meeting was that it was
13 okay for a container, I think that should be from Mr. Bangarie
14 especially when the container has vehicles. In some cases when
15 vehicles get stolen, they always get the containers back. So
16 that's what I got at from one of the Zoom meetings that we had
17 based on the container that was shipped, that it was coming
18 back to Baltimore. That is what I know about a container
19 coming back to Baltimore.

20 Q. When did you learn that?

21 A. Based on my recollection I don't have a specific date
22 that I learned that because I didn't recall, unless I go back
23 to some of the meetings at the time that those meetings were
24 held.

25 Q. And who told you that information? Who gave you that

1 information about why the container was coming back --

2 A. That was in a Zoom meeting.

3 Q. But who in the Zoom meeting?

4 A. I can't recollect because the Zoom meeting, people
5 contribute, but I can't recall it if one -- it should be
6 either Bangarie or St. Michael or Mr. Rogers because they were
7 the one handling the shipments.

8 Q. So Mr. Rogers, Mr. Bangarie or Mr. St. Michael, those are
9 three of the five people in this response team WhatsApp?

10 A. Yeah, I don't know everybody that's on the WhatsApp
11 Response team. So the Response team involved -- the Response
12 team involved those that we're seeing right here and I don't
13 know if all of them were in the Zoom meeting, but there was a
14 Zoom meeting. But I don't have specifics who was in the Zoom
15 meeting and who was not in the Zoom meeting.

16 Q. And plan B was that you were going to provide a false
17 name, a different name who was responsible for the contents of
18 the compressor tanks when that container arrived back in
19 Baltimore, correct?

20 A. That is not true.

21 Q. Do you recall conversations with Mr. Akem about his plans
22 to travel to Nigeria in March of 2019?

23 A. I know Mr. Akem travels to Nigeria frequently and during
24 that time I know he was in Nigeria or he planned to go to
25 Nigeria because that was discussed in some of the Zoom

1 meetings and he goes to Nigeria frequently.

2 Q. But he was specifically going in March of 2019 to meet
3 that container, correct?

4 A. Based on my recollection I would not -- I don't want to
5 be precise, because I don't want it to be taken out of
6 context. They were doing the shipping, so I wasn't involved
7 with shipping. I don't have any idea with what the process is.
8 You have Mr. Bangarie, he's a specialized shipper. He is
9 competent, has a license to do what he was doing and he
10 managed that. So all the arrangement that was done for the
11 container, who was going to collect the container, who was
12 going to receive the container, those paperwork and
13 everything, that was done by them. And if you look at all the
14 paperwork, I don't have an idea on those things.

15 Q. But my question was specifically about your knowledge of
16 Mr. Akem traveling to Lagos, Nigeria in March of 2019. Did
17 you know that?

18 A. I know he went to Nigeria. I don't know if he went to
19 Lagos. I know he went to Nigeria. He went to Nigeria on
20 several occasions.

21 Q. But I'm specifically talking at this time. And was that
22 trip to your knowledge so that Mr. Akem could meet that
23 shipping container that we've heard so much about?

24 A. Yes, yes because we all knew there was shipping container
25 and the container was going to Nigeria. And he was going to

1 Nigeria to participate in collecting the container. That is
2 not something that I'm disputing. But what I'm saying, the
3 specifics I don't know because I wasn't part of that team.

4 Q. You weren't on the Shipping team?

5 A. I wasn't on the team that were involved in the shipping
6 and documentation and all of that. St. Michael, Mr. Rogers and
7 Mr. Bangarie, they were on that team.

8 Q. And how about -- what was the name of the team that you
9 were on?

10 A. No, I was more on the -- I was more on -- more on the
11 cleaning of the shells which I described here, the de-priming
12 of the shells and priming of the shells. So those are the
13 things I did and I would count some of the shells and
14 ammunition that he bought. I would arrange them and most of
15 the time that I went to his lab with Mr. Fonguh we would clean
16 the basement. So those -- St. Michael clearly defines what he
17 wanted us to do because he didn't want us to do things that we
18 were not very skilled at.

19 Q. And then there was a Concealment team, correct?

20 A. Based on my -- based on my knowledge there was a team
21 that were doing other things. Some were maybe concealment, but
22 there were teams that did other things, but I was focused on
23 what I was assigned to do because he assigned you to do
24 specific things.

25 Q. And so the Concealment team wasn't something concealed

1 from you, is that fair?

2 A. Based on my knowledge, I can't recall it.

3 Q. And who was on the concealment team?

4 A. There were a lot of people that came to the labs at
5 different times, so I don't know who was on what team because
6 they came to the lab. But I know Muma was working on one of
7 the teams. I can't recollect. I can't tell you specifically
8 because I don't want it to be taken out of context.

9 Q. Well, what did Mr. Muma do at the lab?

10 A. Mr. Muma would come to the lab not all the times I was
11 there, but a few times I was there he was doing his own stuff.
12 So I can't recall it because I can't give you specifics
13 because we were at the lab different times and the people who
14 came at the lab were doing different things. So I don't want
15 it taken out of context because I don't want to give specifics
16 and then that specific is taken out of context. So yeah.

17 Q. How about generally, do you have an idea of what Mr. --

18 A. No, I don't want to use -- I don't want to get to that
19 generally.

20 Q. Now you mentioned before, you acknowledged 34A if we can
21 pull that up, that you created this PowerPoint presentation at
22 Mr. St. Michael's direction?

23 A. Yes, yeah. That's a PowerPoint that I created.

24 Q. And this was the PowerPoint presentation that was
25 presented at the fundraiser at Mr. Fonguh's residence?

1 A. Yes.

2 Q. And there were dozens of people there; is that fair?

3 A. Yeah, there were people there. My mom was there. Some of
4 the people came, came with family members, so I was there.

5 Q. And this presentation was in support of a fundraiser to
6 raise money, correct?

7 A. This fundraiser was to raise money like I said earlier,
8 to send to Cameroon to help the vulnerable population defend
9 themselves from the carnage that was going on.

10 Q. If we look at the presentation, would it be fair to say
11 that all but one of these slides features ammunition and
12 firearms? Would you agree with that characterization?

13 A. We all see it and those firearms, those are the firearms
14 that St. Michael has in his home and those were most of the
15 firearms that we saw. And all of those things he said he has
16 license and he bought them legally.

17 **THE COURT:** Mr. Nji, really, if you would just try
18 to listen to the question, sir, and answer the question.

19 **THE WITNESS:** Yeah, so those you have firearms and
20 you also have humanitarian aid support of things that we were
21 involved with.

22 **BY MR. MIHOK:**

23 Q. And when this presentation was shown, the families were
24 all there, correct?

25 A. The people that we invited were present.

1 Q. And so they saw all the pictures of the firearms -- I'm
2 sorry, I'm not done with my question, sir. They saw all the
3 pictures of the firearms and the ammunition, right?

4 A. Based on my recollection the basement where these -- the
5 presentation wasn't like throughout the basement. There was a
6 pitch that he was making at a specific time when it was time
7 for presentation and he was talking to a specific audience.
8 Based on my knowledge I can't recall who it was at that time.
9 But basically the whole presentation, it was based on the
10 presentation, but there was a time when he presented his
11 PowerPoint because he wanted community, different communities
12 like he talked about Bafut community, Chomba, Nsongwa. So they
13 were targeting some of those committee members here in the
14 U.S. to contribute for so they can take care of some of the
15 600 villages that were burnt.

16 **THE COURT:** Thank you. Can we move onto the next?

17 **MR. MIHOK:** Yes, Your Honor.

18 **BY MR. MIHOK:**

19 Q. You mentioned that you knew that "Peanuts" and "Ground
20 nuts," that meant ammunition, right?

21 A. That is not the language that I created. That is
22 something that is common in the Cameroon community, especially
23 people that are going through --

24 **THE COURT:** Mr. Nji, that really was just a yes or
25 no question.

1 **THE WITNESS:** Can you rephrase the question again,
2 please?

3 **BY MR. MIHOK:**

4 Q. You know that the terms "Peanuts" and "Ground nuts,"
5 those refer to ammunition, correct?

6 A. Those are ammunition, yes. I know they are ammunition.

7 Q. And that "sticks" are firearms?

8 A. Those are things that everybody know.

9 Q. And "popcorn" is explosive?

10 A. I know "popcorn" is explosive, but based on my
11 recollection, I don't do popcorns.

12 Q. And your testimony if I understood it on direct
13 examination was that everyone in Cameroon calls firearms
14 "sticks;" is that right?

15 A. No, I didn't say everyone in Cameroon. I said in the
16 Southern Cameroons where the war is taking place that is a
17 coded language because the people don't want retribution from
18 the Government when they get a text, phone and they see you're
19 talking about bullet and everything because you're
20 communicating.

21 Q. If I understood your testimony on direct it was that
22 everybody knew it.

23 A. I said in the Southern Cameroons. I didn't say "every."
24 I don't know -- I always want to use general terms because
25 it's not a word that I created.

1 Q. So would it be fair to characterize that those code words
2 are common knowledge based on your direct examination?

3 A. I don't want to confirm that because I didn't create the
4 code words.

5 Q. You don't want to confirm that?

6 A. No, I don't want to -- based on my recollection I don't
7 -- I will not respond to that question.

8 Q. Well, I'm not saying you came up with those code words,
9 just so it's clear.

10 A. Can you rephrase the question?

11 Q. I'll just move on. When did you first hear about St.
12 Michael's arrest?

13 A. That was sometime in maybe July of 2019. I am not
14 specific. I cannot give a specific, but I know he was
15 arrested, it was on social media sometime in 2019.

16 Q. Around July of 2019?

17 A. July of 2019 if that was right, sir.

18 Q. Just wait for me to finish the question please, sir.

19 A. Okay.

20 Q. Who told you? How did you hear that Mr. St. Michael had
21 been arrested in July of 2019?

22 A. It was on social media.

23 Q. And if we could pull up Exhibit 30B, please. And if we
24 could just highlight the top portion of that. Do you recognize
25 these transactions in this exhibit, 30B?

1 A. Yes, I do.

2 Q. And, in fact, the very first one was the one you talked
3 about on direct examination, correct?

4 A. Yes.

5 Q. And do you see down here at the very -- the last two on
6 this part that's highlighted are July 21, 2019 from you to Mr.
7 Tita and from you to the Rolling Stone. Do you see those two
8 transactions?

9 A. Yes.

10 Q. And who was the Rolling Stone?

11 A. That's Rogers -- based on my recollection for those two
12 transaction, especially the one that goes to Wilson Tita, he
13 reached out to me at the time if I can recollect and he said
14 -- because at this time we already knew St. Michael was
15 arrested. And he needed some support to provide to his family
16 by the time they were going through hardships, so that is why
17 I sent him that money.

18 Q. And so both of those payments -- I just want to make sure
19 I'm tracking you, Mr. Nji.

20 A. Yeah, Rolling Stone had requested -- basically he needed
21 some money to pay some expenses, I will not recall. I can't
22 really recall why he needed for that. He requested money from
23 not only from me, but from other members to pay some bills
24 from which I provided the support.

25 Q. And I think you just mentioned that "popcorn" was

1 explosives, but that you didn't get involved with popcorn, was
2 that right?

3 A. I don't -- I can't recall if I said popcorn were
4 explosives, but those are words that -- those are words that I
5 just came in to originally know them.

6 Q. Do you know "popcorn" to mean something else? I mean, in
7 this context when you're talking about consignments and
8 shipping and --

9 A. No, I don't want to respond to that because I don't want
10 it to be taken out of context.

11 Q. Well, were you actually sending, like, popcorn that you
12 would eat to Cameroon?

13 A. There's no way. I don't see anywhere that says I sent
14 popcorn to Cameroon.

15 Q. Let's go to the bottom of 30B, please.

16 A. Okay.

17 Q. Do you see there on June 11th -- I'm sorry, November 6,
18 2019 and November 2, 2019?

19 A. Yeah, so I can't --

20 Q. No, no, do you see those?

21 A. Yeah, that is going to --

22 Q. Do you see that, sir? And do you see that's going from
23 you to Emmil Fonguh, both of those for \$500 total?

24 A. Yes.

25 Q. And the transaction or the subject of that transaction is

1 "popcorn" isn't it, sir?

2 A. Yes.

3 Q. Let me ask you about the frequency with which you went to
4 the lab, Exhibit 36D, please. And I believe that you covered
5 this on direct, but I just want to talk to you about it quick.
6 And the second page, November 19, 2018 message. You see that
7 there, right?

8 A. Yes.

9 Q. Do you see there where you and Mr. Fonguh are going --
10 you wrote this message, correct?

11 A. Yeah, that's my -- every message, yeah, that's true.

12 Q. And on November 19, 2018, correct?

13 A. Yup.

14 Q. And going to the lab three days a week. Do you see that?
15 "We're going to the lab at least every week, sometimes three
16 days per week since we started the project." Do you see that?

17 A. Yes, I see that. Three days a week for that week I went
18 there because I think it was a federal holiday or I was on --
19 I took off time from work. At this time that's when most of
20 the -- we had a lot of villages were being burnt.

21 Q. So with regard to this, in this time frame, you were able
22 to go three times?

23 A. I went three times -- I don't have -- yeah, I went three
24 times, not all the time based on my work schedule, but I don't
25 work all the time. When I take off a week, I go to the lab

1 frequently because the days that I'm busy, I can't go to the
2 lab.

3 Q. And the ride sharing team, that's referring to you, Mr.
4 Fonguh and Mr. Muma, correct?

5 A. Yeah, the ride sharing team, most of the time on the
6 weekdays I would go with Mr. Fonguh. On Sundays I would ride
7 with Mr. Fonguh and Mr. Muma. But on weekdays Muma goes at
8 different time because we have different work schedules.

9 Q. And so from 2017 through 2019, how many times do you
10 think you went to the lab to do work?

11 A. Based on my recollection I wasn't putting that down, so I
12 can't tell you because I can't tell you specific because I
13 don't know.

14 Q. Do you have an idea of the percentage of time you went
15 with Mr. Muma?

16 A. I went a few Sundays. I was going there few Sundays with
17 him, Mr. Muma, but I can't give a specific because there's no
18 -- I can't -- I can't provide specifics on that because I
19 don't have that. I wasn't writing that down. I don't have it.

20 Q. And on those times that you rode with Mr. Muma to the
21 lab, did you discuss with Mr. Muma what he was planning on
22 doing at the lab that day?

23 A. No. No, when we go to lab with Mr. Muma, we talk about
24 the challenges that our people are going through in Cameroon
25 and the best possible ways we can support them to see how they

1 can -- the war can be resolved and also provide them the
2 resources, food, medication and resources and all the things
3 that we sent so that it can stop the bloodshed.

4 Q. Well, when you were at the lab with Mr. Muma -- so I
5 guess you didn't specifically talk about the jobs you were
6 going to do when you got to the lab on that day?

7 A. No, the jobs -- what we do in the lab is not -- that is
8 not being assigned to us by me or Mr. Muma. Everything is
9 being assigned by Mr. St. Michael. So we go to the lab and
10 then he says hey, this is what specifically, I was cleaning
11 shells, I was priming, I was priming the shells. So Mr. Muma
12 would go, St. Michael would give him something to do. So I
13 can't say what Mr. Muma would do specifically. I think he can
14 attest to that by himself, but I'm talking about myself and
15 what I did.

16 Q. Very well. When you were at the lab, did you see -- with
17 Mr. Muma, what did you see Mr. Muma doing?

18 A. Based on my knowledge, I can't recollect. I don't want to
19 explain what he did because he should say that for himself. I
20 can only say the things that I did.

21 Q. Did you ever see Mr. Muma wearing safety glasses and
22 gloves?

23 A. Based on my recollection I don't think so. I don't know.
24 I never seen him.

25 Q. Based on your recollection --

1 A. Based on my recollection I've never seen him with glasses
2 or goggles -- with what you are trying to describe.

3 Q. And what about -- I believe it's 25H. Do you see on the
4 back of the commode there?

5 A. Yeah, I see that and I saw this in court. When I started
6 coming to court I see that, but I've never been in the lab and
7 have this. Because it's even sitting in a location where if
8 you're not paying attention, would not even notice that. When
9 I get to the lab, you see where this is sitting? Where I work
10 is a little bit far from here. And the lab is where you have
11 a lot of things put all over the place. So I won't tell you
12 that I saw this or not because that's been a long time. So I
13 can't based on my recollection.

14 Q. Based on your recollection you don't recall?

15 A. Based on my recollection I don't want to be specific
16 because I don't know if I saw it or not, but I don't want to
17 be misquoted.

18 Q. And how about do you recall Mr. Muma describing the noise
19 that the grinder made?

20 A. That is his version of defining noise. I can't recall the
21 noise that he defined because that is a noise that he heard.
22 But I don't know if he was in the lab when I was there, when
23 the noise was -- when he heard the noise because I didn't go
24 to the lab with Mr. Muma all the time.

25 Q. Well, did you ever hear a noise like somebody grinding

1 metal?

2 A. No.

3 Q. Never?

4 A. Based on my recollection, no. In the lab you have --
5 there's a TV in the lab, there's a radio in the lab and also
6 St. Michael has his milling machine in the room that's always
7 locked. So when he program the machine you can hear light
8 noise coming from that room. That's the noise that you hear,
9 but we always have music playing when we're cleaning shells
10 and de-priming and priming those shells.

11 Q. How about any of the firearms, did you ever observe any
12 of the firearms with fresh grindings or filings on them in
13 multiple areas?

14 A. Based on my recollection, no.

15 Q. Did you ever participate -- if we could pull up Exhibit
16 22, please. Mr. Nji, this is the video. You recognize that?

17 A. Yes, I recognize this is in St. Mike's basement.

18 Q. And just tell us to pause it when we get to the area
19 where you were doing the work that you described before.

20 A. Okay.

21 **(Videotape was played.)**

22 A. So you see what looks like this table, those are the --
23 that is where I always work. We have those de-priming and
24 priming machine. So when I come with Mr. Fonguh, we always
25 change because this is the table that we use and you have

1 these shelves there so you have -- you have to spray them with
2 oil and then to have the rust loosen up and then you de-prime
3 because in most, some cases it will break the plunger. And we
4 did that because it's very tedious work. And when we started
5 doing the fundraisers and I didn't have enough time to go to
6 the lab, that's when it stopped being as good.

7 **THE COURT:** That's the table.

8 **BY MR. MIHOK:**

9 Q. So this area of the table, that's where you were working
10 primarily?

11 A. Yeah, towards this end so I can't speak, but it's always
12 towards the end of the table.

13 Q. And if we can let the video play.

14 **(Videotape was played.)**

15 **MR. MIHOK:** We can pause the video here.

16 **BY MR. MIHOK:**

17 Q. Do you recognize any of the tools or items on the other
18 end of the table? This would be the far end of the table. Is
19 that a fair characterization?

20 A. Yeah, you have a lot of tools. I'm not skilled in some of
21 the things that are there. What I'm -- the things I can tell
22 you is the de-primer and the machine that we use to de-prime.
23 So all the other tools --

24 Q. Do you recognize, sir, is this a vise?

25 A. Based on my recollection I don't know what is a vise. I

1 can't specifically tell you that, but I know I work to clean
2 shells and de-prime shells. So if that's a vise, I don't know
3 if I'm getting that from you now.

4 Q. And did you ever do work at this end of the table as
5 well?

6 A. Based on my recollection I can't -- I don't remember.

7 Q. Okay, if we let the video play, please.

8 **(Videotape was played.)**

9 **MR. MIHOK:** We can pause the video there.

10 **BY MR. MIHOK:**

11 Q. Do you know what was in that box, sir?

12 A. Based on my recollection, I don't know.

13 **MR. MIHOK:** Let the video play.

14 **(Videotape was played.)**

15 **MR. IVEY:** Your Honor, is there a question pending?

16 **THE COURT:** I assume there will be.

17 **MR. MIHOK:** Yes, there will be.

18 **BY MR. MIHOK:**

19 Q. So if we pause right here for a second, the table that we
20 were looking at when the video first started, is that directly
21 behind the person as they're filming this portion of the
22 video?

23 A. Um, I can't -- based -- I can't answer that. I wasn't the
24 one filming, so I can't answer that question. I wasn't there
25 when you were filming this so that's not a response that I'm

1 going to respond to.

2 Q. Okay, let's let it play, please.

3 **(Videotape was played.)**

4 **MR. MIHOK:** If we could pause here, please.

5 **BY MR. MIHOK:**

6 Q. Is this the area where the photograph was taken with the
7 grinder, right? Doesn't that look familiar, that scene?

8 A. I know you have a lot of things there, you have a toilet
9 part so also you have a lot of items. Specifically I didn't
10 take note on the things, everything that was in this area of
11 the basement because I didn't work in that area. But there
12 were a lot of things in going to the lab, specifically I won't
13 tell you. A, specifically I will tell you this is here
14 because I was not using this to do my work. I came in, I had
15 specific task to do and I did that specific task.

16 Q. Did you ever see Mr. Muma going to this area of the lab?

17 A. Based on my recollection, I don't know. He came to the
18 lab at different times without me. I didn't go to the lab with
19 him all the time. So I didn't -- I wouldn't specifically tell
20 you that he came to this because I wasn't checking what he was
21 doing, where he was going. We just went to the lab to do the
22 work that we have to do to ensure that our people have the
23 resources to defend themselves.

24 Q. With regard to this area, is there any sort of door or
25 covering that -- in this separate area here where the toilet

1 was located?

2 A. I can't give you specifics because the house was not
3 organized and construction was going there and it's not my
4 home. So you trying to get information from me on specific
5 information which I cannot provide you.

6 Q. The room that you described before with where Mr. St.
7 Michael had the 3D printer, do you recall where that was in
8 relation to this?

9 A. The room is somewhere in this part of the house, but I
10 can't vividly give you description. It's been a long time
11 since I been there, but the room -- when you go in there's an
12 entrance going on. There's a room that's always locked, but
13 the house is not like -- you have walls we have brought down
14 at the time when I was there so I can't give you specifics
15 because that is not my home. So you're trying to get
16 information from me looking for specific information which I
17 cannot provide at this point, at this time.

18 Q. But you were there numerous times between 2017 and 2019,
19 correct?

20 A. I was there several times, that is correct.

21 **THE COURT:** Let me know when you're at a good
22 breaking point.

23 **MR. MIHOK:** This is probably, Judge.

24 **THE COURT:** All right, thank you. I'm going to take
25 the mid-morning recess.

1 (Recess was taken from 11:33 to 11:43 a.m.)

2 THE COURT: Mr. Mihok?

3 MR. MIHOK: Just briefly, I again I wanted to check
4 with the Court before I explored an area of cross-examination
5 related to the interview of Mr. Nji and it's similar, this was
6 in August, August 26th of 2020. In this instance the agents
7 specifically -- first of all, he never invoked or requested to
8 speak with an attorney. The agents present explained to Nji
9 they were aware of the crisis and war occurring in his home
10 country, but he was asked to the meeting to discuss any
11 activities contrary to U.S. law, not matters of humanitarian
12 or peaceful protest nature. This is an ROI, page 3. And Mr.
13 Nji responded that he had been active in providing resources
14 and funding. And his answer, I would ask if there was any
15 information relayed regarding a license that he ever relayed
16 that he thought Mr. St. Michael had a license.

17 THE COURT: What is the question?

18 MR. MIHOK: There's not a specific question about
19 whether or not Mr. St. Michael had a license, but based on
20 what we've heard here is that over and over again according to
21 their testimony, Mr. St. Michael was the one telling him
22 everything was legal, he had a license that covered
23 everything. And certainly when this question is put, that
24 would have prompted naturally a response that Mr. St. Michael
25 had informed him that he had a license. And he does not relay

1 that information.

2 **MR. BASILE:** Your Honor, I would object to that.
3 That's not necessarily correct. He was not asked about that
4 and I think it's improper to say now that well, he should have
5 told us about it. He had a right against self-incrimination.
6 If they had asked him that he might have invoked that right.

7 **THE COURT:** I don't even see him referring to Mr.
8 St. Michael.

9 **MR. MIHOK:** Right, I think that's very telling.

10 **THE COURT:** Well, I'm going to sustain the
11 objection. I don't think it's necessarily telling. I don't
12 know specifically what he was asked, whether a bare response
13 would have elicited what he said now, so --

14 **MR. MIHOK:** Would it be permissible to ask whether
15 he mentioned St. Michael at all during the course of this
16 interview?

17 **MR. BASILE:** I would object to that, Your Honor.
18 It's not relevant, nor was he asked.

19 **THE COURT:** Was he asked?

20 **MR. MIHOK:** Specifically about Mr. St. Michael? No,
21 he was not specifically asked that.

22 **THE COURT:** Then I think you should not
23 cross-examine him on that particular line.

24 **MR. MIHOK:** Would it be fair to ask him just briefly
25 what the response he gave to that question?

1 **THE COURT:** What question?

2 **MR. MIHOK:** Well, that they were there to discuss
3 with him any matters contrary to U.S. law, not matters of
4 humanitarian or peaceful protests nature and his response was
5 that he had been active in providing resources and funding.

6 **THE COURT:** Did that already come in?

7 **MR. MIHOK:** I don't --

8 **THE COURT:** Through --

9 **MR. BASILE:** No, it did not, Your Honor.

10 **THE COURT:** Through the agent?

11 **MR. MIHOK:** No, I don't believe so, Your Honor.

12 **MR. IVEY:** Court's indulgence for a moment.

13 **MR. BASILE:** Your Honor, this is not proper
14 impeachment if that's what they're trying to do. If it came in
15 through the agent, there's not an issue here. He's never
16 denied that.

17 **MR. MIHOK:** Well, not every piece of
18 cross-examination is impeachment. I'm gathering information.

19 **MR. BASILE:** And it's beyond the scope also.

20 **THE COURT:** Well, I don't know about beyond the
21 scope, but I think you can't get to the inference that you're
22 trying to get to without beyond that suggesting that there's
23 something else he should have volunteered or without getting
24 into exactly what the questions were. I just -- I agree with
25 defense counsel, I don't think this is appropriate

1 cross-examination.

2 MR. MIHOK: That's why I checked, Your Honor.

3 THE COURT: Thank you.

4 MR. MIHOK: All right, we're ready.

5 THE COURT: Anything else?

6 MR. MIHOK: No, we're ready.

7 THE COURT: All right, then we'll get the jury.

8 (Jury entered the courtroom at 11:50 a.m.)

9 THE COURT: You can all be seated.

10 MR. MIHOK: Your Honor, may I inquire?

11 THE COURT: Yes.

12 BY MR. MIHOK:

13 Q. Mr. Nji, did you ever assist in cutting the tops off of
14 those compressor tanks?

15 A. I don't have the skills to do that.

16 Q. You don't have the skills to do that?

17 A. No.

18 Q. Did you ever see the compressor tanks with the tops cut
19 off?

20 A. I can't recall.

21 Q. Did you ever see a tank with the wrapped firearms in it?

22 A. I can't recall.

23 Q. And did you ever see a tank, compressor tank with the top
24 cut off with a package of ammunition in it?

25 A. I know -- I can't be specific, but I've seen pictures of

1 some of the tanks in court. I've seen maybe some that were
2 leaked, but no specifics. So I can't really recall.

3 Q. And just so I'm clear and I apologize if I wasn't being
4 clear, but I'm talking not here in court, but prior to July
5 19th of 2019 had you seen compressor tanks --

6 A. Yes, I've seen compressor tanks inside Mike's house in
7 his garage when he opened the garage to get one of the things.
8 Based on my recollection I know I've seen compressor tanks.
9 Specific if they were cut or not, I don't have that detail.

10 Q. Did you ever see compressor tanks in the lab area in the
11 basement?

12 A. I don't recollect.

13 Q. What were the compressor tanks for, do you know that?

14 A. I know there was a team that was in charge with doing
15 things with the compressor tanks. I wasn't part of that, so I
16 can't provide specifics since I wasn't part of the team.

17 Q. Would that be part of the Concealment team?

18 A. I can't recollect. I can't respond to that.

19 Q. How many compressor tanks do you think you saw at Mr. St.
20 Michael's?

21 A. I don't have specifics.

22 Q. Was it more than six?

23 A. I don't know.

24 Q. Did you ever see that spray foam we've seen photographs
25 of, the spray foam? And just so it's clear, I'm talking prior

1 to July 19th of 2019.

2 A. I can't recollect.

3 Q. You can't recall it?

4 A. I can't recollect.

5 Q. How about you know what a scope is, the scopes on the
6 guns?

7 A. Yeah, some of the guns that I saw at St. Mike's house had
8 scopes, yes.

9 Q. And what about magazines? Do you know where they --

10 A. Yeah, some of the guns had magazines.

11 Q. And do you recall approximately how many you saw there at
12 Mr. St. Michael's?

13 A. No specifics.

14 Q. But you do -- you know or you knew prior to July 19th of
15 2019 that those compressor tanks were being used to conceal
16 the firearms and ammunition, correct? You knew that?

17 A. I knew they were -- they were concealing or they had --
18 they were using different methods to have -- to do what they
19 were doing, but I didn't have specifics because I was -- I
20 didn't have specifics. But I knew they were using compressor
21 tanks in the lab or wherever, but I don't have specifics. So I
22 can't tell you what the compressor tanks were so I can't give
23 specifics because I don't know.

24 Q. So the firearms themselves, you never saw firearms with
25 the scratchings off, fresh looking like damage or filings?

1 A. Like I said, no.

2 Q. And you were here in court when we went through all the
3 firearms that were recovered from the container, right?

4 A. Yeah, I saw the firearms. I saw all the firearms.

5 Q. Did you recognize any of those firearms from prior to --
6 from January of 2019 --

7 A. There were firearms, but I don't have specifics on those
8 firearms and I can't tell you -- he deal with the firearms, so
9 I can't provide specifics.

10 Q. The address that you provided for the Think Technology --
11 that's your company, correct?

12 A. Yeah. Think Technology is my company, yes.

13 Q. And the address you provided was on Senate Drive in
14 Lanham, Maryland?

15 A. Think Tech -- prior to when I started -- prior to the
16 pandemic I was renting a space there to train, in person. And
17 then when the pandemic came I took everything online. I was
18 doing it from home. And now the pandemic -- after the
19 pandemic so I've transitioned to onsite in Waldorf.

20 Q. How long were you in that in-person facility in Lanham?

21 A. That was sometime between 2017, '18 until the pandemic,
22 so I don't have specific.

23 Q. And this is Defense Exhibit 14. You see the address.
24 This was the address you gave on direct examination, correct?

25 A. No, that is not -- Muma filled that so I don't know what

1 he wrote on that because I wasn't running -- I wasn't the
2 administrator of the enrollment, so I was just training at the
3 time. So I don't even know what specific was there, but
4 everything that was on there it was written by Muma, not me.
5 But I trained him and he was one of the students that I
6 trained.

7 Q. The question was a very simple one, Mr. Nji. The address
8 associated with your company was 10104 Senate Drive in Lanham,
9 Maryland?

10 A. Okay. Okay, sorry. That was the company -- I was renting
11 -- I was using -- when I went to --

12 **THE COURT:** That was just a yes.

13 **THE WITNESS:** Yeah, yeah, yeah.

14 **THE COURT:** Next.

15 **BY MR. MIHOK:**

16 Q. And how long have you known Mr. Bangarie?

17 A. I met Mr. Bangarie when I was invited first at the
18 meeting that I met St. Michael. I met Mr. Bangarie and Mr. St.
19 Michael the same time.

20 Q. And when was that?

21 A. That was sometime in 20 -- like I said, between November
22 of 2014 to December -- November 2017 to December of 2017,
23 around that timeline.

24 Q. And how would you characterize your relationship with Mr.
25 Bangarie?

1 A. Mr. Bangarie, when I meet him at that time I was looking
2 for space, office -- office building. So I was looking for
3 space, like a conference center to train students who wanted
4 to come on-site. So he said it was cheaper for me to hotel
5 space, conference center. So that is why I went there for
6 on-site sessions sometimes. So that's how I met him and I got
7 in contact with him during the meetings and it was cheaper for
8 me to have students who did onsite training at that time.

9 Q. So are you business partners with Mr. Bangarie?

10 A. At the time he provided me the space and he provided the
11 space for the training, so I was paying the space for his
12 training and he was coordinating the admissions part of the
13 training at the time that I started the training.

14 Q. When did you start that arrangement?

15 A. That was sometime in 2018. I don't have specifics on
16 that. 2017, 2018 but I don't have specifics on that.

17 Q. And here if we look at page 3 of defense Exhibit 2017,
18 the school official here that signed this, who is that?

19 A. That's Bangarie.

20 Q. Mr. So Mr. Bangarie was the -- he was the school
21 official?

22 A. Yeah, he was.

23 Q. Let me finish the question, please.

24 A. Yes.

25 Q. He was your school official for Think Technology?

1 A. He was supporting the administrative part of Think Tech,
2 yeah.

3 Q. And how long was he in that role, all the way back to
4 2017, 2018?

5 A. No, he was in that role within -- around 20-- I don't
6 have specific, but when -- he was around that 2017 to 20 --
7 until we went online when the pandemic started. So that is
8 when I transitioned online and then the contract ended with
9 him.

10 Q. And just to be clear, this is the same Mr. Bangarie that
11 is the owner and runs Bonaberi Shipping and Moving?

12 A. That's true.

13 Q. And, in fact, if we look at -- this is Exhibit 29, I
14 believe page 3. What is the address associated with Bonaberi
15 Shipping & Moving?

16 A. That is the address because he was -- if you look at
17 that --

18 Q. What's the address?

19 A. That's the same address, yeah, that's the address of
20 that -- the address where it's a building, it's an office
21 building. So that's an office building.

22 Q. When did you first meet Mr. Akem?

23 A. Mr. Akem?

24 Q. Yeah, Mr. Rogers.

25 A. Like I say earlier, I met him in 2018, around 2018 in

1 person, in 2018. Sometime in 2018.

2 Q. Did you introduce Mr. Rogers Akem to Mr. Bangarie?

3 A. No, Mr. Akem, Mr. Bangarie and St. Michael, they are -- I
4 met Mr. Bangarie at the meeting, the Kindness meeting. So
5 that's when I originally met him at that time. It has nothing
6 to do with Bonaberi Shipping. And then St. Michael and Mr.
7 Akem and Bonaberi Shipping, I don't have anything to do with
8 that relationship. So we shouldn't be mixing things here.

9 Q. I'm sorry, the question is whether or not you
10 introduced --

11 A. No.

12 Q. --Mr. Akem to Mr. Bangarie. Is that a yes or a no?

13 A. That's a no.

14 Q. And if we could go back to -- and looking at Exhibit 29,
15 the dock receipt, you see it's indicated in the container
16 there, correct?

17 A. Yes.

18 Q. And this was the same container that you were discussing
19 on direct examination that you assisted loading in January of
20 2019 by Mr. St. Michael's house; is that right?

21 A. No, I don't have details on that because I wasn't part of
22 the shipping of the container, so I don't have any information
23 about that.

24 Q. Well, on direct examination didn't you testify that you
25 and Mr. Fonguh arrived and you were assisting loading the

1 container, it was half-full?

2 A. Yeah. So what I took about that receipt, I saw a
3 container. So that is all I know about a container. But in
4 terms of the paperwork and that receipt, I don't have any
5 details on that.

6 Q. And what did you load in the container?

7 A. Like I said, loaded barrels. In those barrels there were
8 medication, there were sanitary pad, you had food and those
9 were going to displaced people who were going through torture
10 and suffering.

11 Q. So you knew that those compressor tanks were loaded into
12 that container though, right?

13 A. Yes, because the guns and the bullet that we -- we were
14 -- the shells and all of that, yes.

15 Q. How many compressor tanks were loaded in the container as
16 what you knew in January of 2019?

17 A. I don't have any recollection because I didn't know when
18 they were loaded, but when I got there the container was
19 half-full.

20 Q. Half-full?

21 A. Yes. So that's what I said and I want to stay consistent
22 with that. The container was half-full when I got there with
23 Mr. Fonguh.

24 Q. And you were there with Mr. Fonguh about four hours that
25 day helping to load?

1 A. I didn't keep track of time, so I can't give specifics.
2 So I don't know how long we stayed there, but I was there
3 brief and I have to go back to work.

4 Q. Did you say you were there briefly?

5 A. I was there. I don't know how long I was there. So I
6 left there and I had to go out, to go home and prepare for
7 work, so I don't know how long I stayed there.

8 Q. If we could pull up Exhibit 1A, please. Do you recognize
9 Exhibit 1A?

10 A. Yeah, this is one of the guns that I saw when I was at
11 St. Michael, one of these, one of the guns that I saw when I
12 was at St. Mike's. So it's one of the guns that I saw at his
13 house, at his house.

14 Q. And do you know, this is a .50 caliber sniper rifle?

15 A. Um --

16 Q. Do you know that?

17 A. I know that that is one of his guns. So I know it's one
18 of his guns.

19 Q. 50 BMG?

20 A. Yeah, he said it's 50 BMG, yeah.

21 Q. And that sniper rifle with a range of about 2,000 yards,
22 correct?

23 A. I don't have the specific -- I'm not in the military, so
24 I don't have the specifics on that.

25 Q. What do you know about a 50 BMG?

1 A. I know he is always -- St. Mike always say it's a high
2 caliber weapon and he talked so good about the weapon, so that
3 is what I know about 50 BMG.

4 Q. Do you recall in 35 AF if we could pull that up, please.
5 And do you recall there at the bottom, the last message or
6 comments there from Mr. Tita on July 12, 2019. Do you recall
7 reading this message?

8 A. Yeah, most of the messages that came I read some, I
9 didn't read some, but I know I read messages from the members
10 of the group, including Mr. Tita.

11 Q. And then on the next page, do you comment on that?

12 A. Yeah, I comment -- I will comment on some of the
13 messages.

14 Q. And, you know, Mr. Tita was talking about what a sniper
15 rifle's primary purpose is or function, correct?

16 A. I read that in court. I don't know if I saw it when he
17 posted that, but that is something that you can get in Google.
18 So yeah, that is something that is in Google, so I can't get
19 specific if I read that or not.

20 Q. Okay. Well if we go to the second message down on the
21 next page, so the original message was at 9:44. Here you are
22 at 9:46 -- I'm sorry, on page 2. And you respond, "Great, let
23 keep investing to achieve our goals." Do you see that?

24 A. Yes.

25 Q. And that was commenting on Mr. Tita's post about sniper

1 rifles and how they can be used effectively?

2 A. Maybe. I can't recall if that was it, but it's a high
3 caliber weapon and based on my understanding the comment might
4 be from that. I can't get the entirety -- if you have -- at
5 the time, if I have the general contextual list, the comment
6 that was at that time --

7 Q. Well, I just showed it to you, sir. I just showed you at
8 the bottom of 35AF there's Mr. Tita's post and then we go to
9 the very next page, there's those two at the top, there's
10 comment -- there's some response here from Mr. Tita, but I
11 don't see any data there. And then the very next message,
12 less than two minutes later is your message "Great, let keep
13 investing to achieve our goals." Do you see that?

14 A. Yes, and the goals is to ensure that we stop the killing
15 of innocent babies in the Southern Cameroons. That is the goal
16 and to ensure that women and babies should not be --

17 Q. Okay, let me ask you the 35AB, please. And do you see at
18 the top actually, the comment from the Ghost, "Hi House, I
19 just got an offer for 50 BMG single shot with scope for
20 \$3,200. Please let's try to make headway to get it before it
21 goes." Do you see that from Mr. St. Michael?

22 A. Yes.

23 Q. And that's at 8:17 p.m., right?

24 A. That's correct.

25 Q. And your next -- the very next comment here in 35AB, what

1 did you write there, sir?

2 A. I said, "I am broke but I have cashed app \$200 to Ghost.
3 Please confirm. Will see as time unfolds if I can make it up
4 to \$500. I love 50 BMG, it's my baby. God bless."

5 Q. And the 50 BMG that you're referring to is the same 50
6 BMG or style rifle that we saw in Exhibit 1, right? That
7 sniper rifle?

8 A. Yes, that's because Mr. Tamufor says he has the license
9 to buy all these guns, so I knew it was legal for him to get
10 those guns.

11 Q. And you -- "I love 50 BMG it's my baby." This was your
12 way of encouraging other individuals to also give money so you
13 could buy that 50 BMG; isn't that right?

14 A. Yes, because I did this, I was internalizing the
15 situation where my cousins was --

16 **THE COURT:** The answer --

17 **BY MR. MIHOK:**

18 Q. The answer that you were trying to --

19 **THE COURT:** It was yes. Next question.

20 **THE WITNESS:** Yes, yes.

21 **BY MR. MIHOK:**

22 Q. You were present on -- if we could go to 32M, please.
23 That's you on the left-hand side there?

24 A. Yes.

25 Q. And that was one of your jobs, you took minutes for these

1 meetings; isn't that right?

2 A. No, I took notes when I go to meetings and if I attend
3 the meetings I'll take notes if there's nobody to take notes.
4 I didn't attend every meeting, but the few meeting I attended
5 I take notes. We didn't have anybody that was, like, in
6 note-taking, so everybody would take notes.

7 Q. Sir, aren't there a number of WhatsApp messages where
8 individuals are asking you to forward the minutes from the
9 last meeting? Does that sound familiar?

10 A. Yes, but if you can recall there are a lot of meetings
11 that we had with all the meeting notes were not provided by
12 me. So the notes that I took, I provided to them. And at the
13 time I knew everything that we were doing were legal. If they
14 were not legal, I would not take notes and expose myself or
15 anyone. So I was acting based on my --

16 Q. So you took minutes for these meetings?

17 A. I took minutes and notes, yes.

18 Q. And that's one of those examples where you produced
19 minutes was Exhibit 76A, correct? You produced this document,
20 correct, sir?

21 A. Yes, yeah, I did that.

22 Q. And on direct I just want to make sure I understood your
23 testimony, you know that firearms have serial numbers,
24 correct?

25 A. No, I can't recall if I know, but based on my

1 recollection, I'm not a firearm expert. I know every item has
2 a serial number. Even this water has a serial number. So
3 everything has a serial number. There's nothing that doesn't
4 have a serial number, so I will not specifically say I knew
5 firearm has a serial number because everything that is
6 produced has a serial number. Most of the things, like in the
7 United States --

8 **THE COURT:** Okay.

9 **BY MR. MIHOK:**

10 Q. So sir, just to be clear, you know that firearms have
11 serial numbers, that's correct?

12 A. Like I said, everything has a serial number. So I here
13 doing this, it wasn't specific that firearm has a serial
14 number, but I'm saying that items that are produced by
15 manufacturer has serial numbers provided to those product by
16 the manufacturers.

17 Q. And are you saying that you thought St. Michael had a
18 license that made it lawful to take or file off serial numbers
19 from firearms?

20 A. So I'm not going to respond to that because that is your
21 thinking. So I will not respond to that because that is what
22 you think, but I'm saying that I knew Mr. St. Michael has a
23 license to acquire firearms and what I was doing --

24 Q. You knew he had a license to acquire firearms, correct?

25 A. I knew he had a license that covers everything that we

1 did.

2 Q. Did you think Mr. St. Michael had a license that allowed
3 him to hide, conceal ammunition and firearms in pressure
4 containers and pressure tanks and ship them out of the
5 country?

6 A. I don't have a response to that.

7 Q. Sorry?

8 A. I don't have a response to that. Based on my knowledge I
9 know that Mr. St. Michael and Mr. Bangarie and Rogers who were
10 involved in shipping, they have what is required to ship.

11 Q. Just so I'm clear, Mr. St. Michael told you he had a
12 license to acquire firearms, correct?

13 A. He say he has a license that covers what he does.

14 Q. And when --

15 A. I don't recall. There's no recollection if he was
16 specific. So I don't want to be taken out of context.

17 Q. Well, when did he make that statement to you?

18 A. He made that statement the first time I went to his home
19 and I went to his home with Mr. Fonguh. And I was surprised to
20 see -- so I went to his home and that was the first time I'm
21 seeing that number of firearms owned by an individual. So I
22 was -- I think Mr. Fonguh explained that, what are you doing
23 with this, this number of guns. So that's how the conversation
24 came.

25 Q. So that was the context for the conversation, correct?

1 A. That was one of them. But on several occasions like I
2 said, he made mention of that so I don't want to be specific
3 because --

4 Q. Let's just stay with that first time. So you've never
5 seen this number of firearms before, correct?

6 A. Like I said, I didn't know anyone was going to have -- is
7 having those many firearms, so that is how it came, but I
8 cannot give you specifics because that is something that took
9 place a long time ago.

10 Q. Right, but it's a memory you still have because it was
11 shocking to see the number of firearms that Mr. St. Michael --

12 A. Not shocking, it was surprising. I didn't say
13 "shocking."

14 Q. We'll use your word, "surprising."

15 A. Okay. Rephrasing, yeah, surprising.

16 Q. Surprising. So in that context in that setting, Mr. St.
17 Michael said to you, don't worry, I have a license for these
18 firearms?

19 A. No. Based on my recollection he informed, he told us he
20 has license that cover the things that he did in his lab. He
21 did say specifically he has license to cover the things that
22 he did in his lab.

23 Q. So the very first time you're meeting with him and you're
24 just seeing firearms, you don't know about anything else he's
25 doing in his lab, do you?

1 A. No. When we went in there, he has all those things were
2 there. Like he testified yesterday, he's been doing bullet
3 reloading for a very long time, so those things were also in
4 his lab. It's not like -- the lab that we see it is not how
5 the layout was when I went in. So I don't want to get
6 specific to that, but the things he said, the things that he
7 was doing in his lab he said he has license or documents that
8 cover, so I'm just -- I'm not providing specifics on what he
9 said, but based on what he said we knew he has legal document
10 to do what he was doing.

11 Q. With regard to Exhibit 35S -- well, let me just ask you
12 one wrap-up question on that. So was it your understanding
13 that a license was required to reload ammunition?

14 A. Based on my knowledge I don't know. Based on my knowledge
15 I don't know, so I can't answer the question.

16 Q. And based on prior to July of 2019 did you know if a
17 license was required to privately manufacturer a firearm?

18 A. Based on my recollection, I can't respond to that.

19 Q. You can't respond?

20 A. I won't respond to that because I don't want to give
21 specifics to be taken out of context.

22 Q. I think on direct examination you were talking about this
23 particular message in the middle here, 35S.

24 A. Sure.

25 Q. And that's on April 17th of 2019?

1 A. Maybe, yes. That is the date, yes, April 17th.

2 Q. And this is from you, right?

3 A. Um-hum.

4 Q. And who is Commander Wal?

5 A. That is Mr. -- that should be Mr. Muma.

6 Q. Mr. Muma. And who is Commander Kool?

7 A. That is Collins. That is -- I think that should be Anye
8 Collins.

9 Q. And here you're talking about completing a consignment
10 with Commander Wal; is that right?

11 A. Yes, some of the -- like this consignment that I was
12 talking about, it was a barrel with medication. It was a
13 barrel with sanitary pad. It was a barrel that contained food
14 that was going to refugees that were being tortured and
15 maimed.

16 Q. In this time frame was Mr. St. Michael heavily involved
17 in that humanitarian side of things?

18 A. I don't recall it. I know St. Michael, he's passionate
19 about the killings and he want --

20 Q. Was he heavily involved in the humanitarian end of
21 things?

22 A. St. Michael was heavily involved with defense and with
23 everything that was going, so he was running the operation
24 with Bangarie and Mr. Akem. So I don't have a specific,
25 because he can speak for himself. I'm just speaking for

1 myself.

2 Q. Right, but the lab there where the ammunition was being
3 reloaded, that's Mr. St. Michael's residence?

4 A. Yes.

5 Q. And he's the one with the expertise and the firearms and
6 the ammunition, correct?

7 A. Yes.

8 Q. And in this message you write, "Ghost is carrying
9 everything on his shoulder." Do you see that?

10 A. Yes, because that's what -- based on -- that's what I --
11 based on what I saw because he is doing, he was doing a lot to
12 ensure that our people get --

13 Q. And then you're encouraging other people to step in and
14 assist?

15 A. Yes, because at the time there was mass killing.

16 Q. But sir, with regard to activities and assisting the
17 Ghost, was that regarding reloading firearms, reloading
18 bullets and that sort of activity that was happening in the
19 lab?

20 A. The activity was not specific. There was a lot of things
21 going on. Like I said, people come at different times and do
22 different things. So the lab in his basement where we also
23 pack humanitarian, we pack humanitarian goods and so he
24 provided the space. So I can't be specific because I didn't
25 go there all the time.

1 Q. And so I just want to be clear, so you're using this kind
2 of language, Commander Wal and the Ghost and he's carrying
3 everything, but this is all about humanitarian aid in April of
4 2019? I just want to be clear.

5 A. Yeah, Commander Kool and Commander -- those are names
6 that -- I didn't give him those names. So just like Mr.
7 Fonguh, I call Mr. Fonguh because that is how I know him. So
8 when I met these guys in the meeting, I know that Commander
9 Kool and -- I don't know how they got those names, but
10 everybody knows them by those nicknames.

11 MR. MIHOK: Court's indulgence. Thank you. Nothing
12 further.

13 THE COURT: All right, thank you. Any redirect?

14 MR. BASILE: No, Your Honor.

15 THE COURT: Okay. Thank you very much, sir. You can
16 step back down.

17 (Witness, excused.)

18 MR. BASILE: Your Honor, I have no other witnesses.

19 THE COURT: All right, no other witnesses. Let me
20 just be sure. Mr. Ivey, do you have any other witnesses or
21 evidence to offer at this point?

22 MR. IVEY: No, Your Honor.

23 THE COURT: All right. And Mr. Benowitz?

24 MR. IVEY: Actually, Your Honor, could we go on
25 the--

1 **THE COURT:** Oh, yeah, um-hum.

2 **(Private conference ensued.)**

3 **THE COURT:** The issue about Mr. Bangarie.

4 **MR. IVEY:** Yes, Your Honor.

5 **THE COURT:** Other than that, nothing?

6 **MR. IVEY:** That's correct.

7 **THE COURT:** Okay.

8 **(Private conference ended.)**

9 **THE COURT:** All right, ladies and gentlemen, there
10 is an issue that I need to discuss with counsel, so I'm going
11 to excuse you, briefly. We'll come back and let you know if
12 it's going to be the lunch recess, but for right now let me
13 just ask you to take a short break.

14 **(Jury excused at 12:25 p.m.)**

15 **THE COURT:** All right, you can be seated. So the
16 remaining issue, let's see, is the notice of the statement
17 allegedly made by Mr. Bangarie during his proffer. And let me
18 start with you, Mr. Ivey. The first issue which I understand
19 from yesterday is that you're challenging the validity of the
20 assertion of the Fifth Amendment as to that statement by Mr.
21 Bangarie, allegedly made during the proffer session. And you
22 provided a couple of cases on that. You can tell me if there's
23 any other case on that issue. But then I don't think I've
24 really heard from you your theory of admissibility, assuming
25 that the witness is unavailable -- your theory of

1 admissibility under Rule 807.

2 And the other question would be if he did not have a
3 Fifth Amendment privilege that was validly asserted, I would
4 still need to know what your hearsay exception was for the
5 statement supposedly made by Mr. St. Michael to Mr. Bangarie.

6 **MR. IVEY:** Well, I'll start at the end. The theory
7 there would be that it's not offered for the truth because
8 it's -- it really just would go to what his understanding was
9 at the time. My understanding is the Government thinks it's a
10 false statement, but that would be the basis there for it.

11 **THE COURT:** So it would go to Mr. Bangarie's state
12 of mind?

13 **MR. IVEY:** Yes, and for --

14 **THE COURT:** How does it translate to your client?
15 How does it get to your client?

16 **MR. IVEY:** Well, because with respect to the
17 statement, it would be an issue that goes to the understanding
18 as to whether Mr. St. Michael made statements with respect to
19 the -- whether he had licenses or not for the shipping part.
20 And so the issue would be from our perspective that the
21 statement that Mr. St. Michael made was a false statement, for
22 sure. And the understanding that Mr. Bangarie carried away
23 from that would go to his state of mind, but also would be
24 relevant to us because it's from the standpoint of the
25 understanding that as we've heard from other testimony, that

1 there was some degree of understanding that Mr. St. Michael
2 had represented that he had the paperwork to do the shipping
3 -- well, with respect to the weapons and the shipping.

4 **THE COURT:** Now the statement that I'm -- perhaps
5 I'm not recalling it all correctly, had more to do with Mr.
6 St. Michael supposedly having some not approval exactly, but
7 that his military superiors knew about what was going on.

8 **MR. IVEY:** Well, that was part of it. So this is the
9 full statement and this is from USA 7737 which is a report of
10 investigation that the Government produced from the proffer
11 session with Mr. Bangarie. And it reads -- the part we're
12 interested in, "Bangarie warned St. Michael about the
13 illegality of shipping arms from the U.S. to Cameroon. St.
14 Michael claimed that he had the military training on how to
15 conceal shipments and even had a badge to get what he needed
16 accomplished. Further, St. Michael suggested to Bangarie that
17 his military superiors knew what he had planned to do and thus
18 convinced Bangarie that there was no need for concern.
19 Bangarie did think it was possible that he could have been
20 being guided by his military superiors."

21 So I agree with the Court about the second part with
22 respect to the military authorization, but the other part is
23 the badge aspect of it, as well. Obviously the badge is
24 connected to the military piece but, you know, something that
25 he had the authority to do what he was doing.

1 And then with respect to I guess the lead part for
2 the Fifth Amendment argument, Your Honor, is a couple of
3 points. One is that the request that -- well, we file a
4 subpoena with Mr. Bangarie. Mr. Bangarie asserted his Fifth
5 Amendment yesterday. And as part of that our follow-up request
6 is that instead of the Court making a blanket assertion or
7 permitting a blanket assertion of his Fifth Amendment right,
8 that we do it question by question. And the basis of that
9 argument is that he's already pled guilty, so on the back end
10 of the statement that was made during the proffer session.

11 The guilty plea came after the proffer and there was
12 a proffer letter that came right before. The guilty plea has a
13 statement of facts attached to it that go to -- because this
14 goes directly to the relevant issues that have been raised in
15 the trial and in his plea, the statement of facts which
16 provides a degree of immunity essentially for the statements
17 that were made because the Government promised not to
18 prosecute unrelated matters in the plea agreement.

19 And so any facts that we used if we called him to
20 the witness stand and he talked about things that are in the
21 statement of facts, he can't face Fifth Amendment -- he
22 doesn't face any exposure or danger to additional criminal
23 prosecution based on those statements. And they shouldn't
24 really impact his sentencing issue because I know the Court
25 was concerned that his sentencing is still pending. But the

1 statement of facts as made was provided to the Court pursuant
2 to the agreement. And I would note from the --

3 **THE COURT:** But I'm just -- you told me yesterday
4 that you had no intention of asking him about the statement of
5 facts. All we were focused on is this one statement that he
6 made in the proffer. So --

7 **MR. IVEY:** Yes, but Fifth Amendment issues -- my
8 reading of the case law is that it's not enough for me to say
9 that I'm not going to ask him a question that would create
10 Fifth Amendment exposure. The issue would go into the
11 Government saying, you know what? On cross-examination we can
12 ask him things that are related to that, but go beyond it and
13 could create Fifth Amendment exposure.

14 The only point I'm trying to make is that that's not
15 present here because of the statement of facts which provides
16 protection from subsequent prosecution because the Government
17 has agreed not to do it.

18 Similarly on the front end --

19 **THE COURT:** Go ahead if you're not finished. I
20 wanted to ask -- I want to get to Rule 807 at some point.

21 **MR. IVEY:** So on the front end there's the proffer
22 statement that covered what he was doing at the time that
23 provided limited immunity at the time that he made the
24 statement because the statement as I understand it was made
25 during the proffer session.

1 I guess I should say for the record, we don't have
2 the proffer agreement. The Government didn't turn that over
3 in discovery. But that's our understanding. I think we were
4 told that it's consistent with other proffer letters.

5 **THE COURT:** Sure.

6 **MR. IVEY:** And so I guess I should say for the
7 record too, the plea agreement that I'm reading from is from
8 21 CR 277. It's ECF 6 is the document.

9 So our argument there is that he's protected on both
10 ends, that the statement that he made was made in the presence
11 of the Government. If they thought it was false they could
12 have charged him with the 1001 violation. They decided not to
13 and it was all rolled into the plea agreement that came
14 subsequently. So he really shouldn't have any Fifth Amendment
15 exposure if he's allowed to testify.

16 **THE COURT:** Okay. Assuming I think he has a Fifth
17 Amendment privilege, you indicated that you were going to try
18 to get this in, you would try to get this in through Rule 807.
19 Are you still pressing that? That is the residual exception
20 to the rule against hearsay. Maybe that's not an issue.

21 **MR. IVEY:** Court's indulgence for a moment. I'm
22 sorry, Your Honor, Court's indulgence for a moment.

23 **THE COURT:** Maybe while you're looking I can hear
24 from the Government.

25 **MS. GAVIN:** Yes, Your Honor. The Government

1 believes that Mr. Bangarie's Fifth Amendment right is valid as
2 attached. He's not yet been sentenced. He's entered a plea of
3 guilty. He made a statement in a proffer session under which
4 the rules were -- the standard proffer rules that if he were
5 to lie or knowingly make a false statement in the proffer
6 session, that the Government would be free to use that
7 information against him.

8 If he were to testify here, the Government does
9 believe that is a false statement. There is nothing to support
10 it. And so I think he still faces quite a bit of exposure,
11 even just on that one statement which is not referenced in the
12 statement of facts. Mr. Bangarie admitted in the statement of
13 facts he knew it was illegal to ship the items. And so for
14 him to get on the stand and make the statement, I believe he
15 would be exposed to potential liability here.

16 I don't see a hearsay exception at all under the
17 residual rule. There are basically five requirements:
18 Trustworthiness, materiality, probative importance, interest
19 of justice and then the notice which they did comply with. But
20 the trustworthiness in and of itself, the defense cannot meet
21 that to somehow get around the hearsay requirement.

22 The Supreme Court has repeatedly recognized that
23 statements made in this sort of situation are inherently
24 unreliable -- can be, when it's post law enforcement learning
25 of the situation. Someone is coming in, he clearly has a

1 motive to lie to either cast blame on someone else which is
2 apparently, appeared to be what he was trying to do in this
3 proffer session. Statements not made under oath. The
4 Government certainly did not accept the statement and there's
5 just -- it's just -- there's no hearsay exception.

6 I sent into the Court yesterday and I showed it to
7 Mr. Ivey, a case *United States versus Cox*, 871 F-479 out of
8 the Sixth Circuit that appears to address a very similar
9 situation in which an individual, the Court found the person
10 had a Fifth Amendment right and the defendant sought admission
11 of statements that that person had made to federal agents.

12 And again, like here, the statements are not
13 self-inculpatory. They're not statements against penal
14 interest which would be, you know, the ordinary kind of way to
15 try and get something like this in. And so even under
16 804(b)(3) there doesn't seem to be any way to get in non
17 self-inculpatory statements in this kind of setting.

18 And for those reasons, the Government's position is
19 that the defendant has not met the burden, his burden of
20 showing how this could possibly come in under any
21 circumstance. And so the Government would object to it.

22 **THE COURT:** Okay.

23 **MR. IVEY:** Just briefly with respect to 807, Your
24 Honor. The 807(a)(1) is the statement is supported by
25 sufficient guarantees of trustworthiness after considering the

1 totality of the circumstances under which it was made. And
2 evidence, if any, corroborating the statement.

3 With respect to the trustworthiness, I think counsel
4 mentioned that the statement wasn't made under oath. But it
5 was made to federal officers in the context of an
6 investigation. So as I mentioned earlier, there's 1001
7 exposure which would be comparable to perjury exposure in this
8 context where the statement had been made under oath.

9 With respect to the trustworthiness and the totality
10 of the circumstances, I do think at this point given some of
11 the testimony that's come in through the trial, there is
12 support, evidence that Mr. St. Michael made statements along
13 the same lines as this, not specifically referencing a badge,
14 but that he did make statements giving assurances that he had
15 authority to do what he was doing. And even though I know at
16 the time that we filed this those statements hadn't been
17 presented in court, they have now. And so I think they are
18 certainly part of the totality of the circumstances that
19 should be considered.

20 And I think it's certainly on point and probative
21 from an evidentiary standpoint because this is the central
22 issue in the trial. I mean, there's really -- at least for
23 those counts, there's really no other issue that the jury is
24 going to have to decide. It's really going to be a question of
25 whether they had a reasonable belief or not that he had the

1 licenses he was supposed to have in order to ship these things
2 legally.

3 **THE COURT:** Okay. Let me start with the Fifth
4 Amendment issue and whether Mr. Bangarie had the right to
5 assert his Fifth Amendment in regard to the one specific
6 question essentially or might have been more than one, but the
7 one statement that has been focused on by the defense. I don't
8 believe that I've been given any case precisely on point by
9 either side. But what we have in this circumstance is an
10 individual, Mr. Bangarie who has pled guilty. He has not yet
11 been sentenced. It is not a final conviction in that sense. It
12 is possible -- I'm not expecting it, but it is possible that
13 he could even move to withdraw his guilty plea. It is not a
14 final sentence and there's not a final conviction at this
15 point.

16 Moreover, as the Government has indicated, they do
17 not, have not accepted the truth of that particular statement.
18 We might note that this was a proffer session that did not
19 result in a cooperation agreement. And the content of that
20 particular piece of Mr. Bangarie's proffer is not necessarily
21 consistent with the statement of facts that he swore to under
22 oath.

23 So I do believe that he could be exposing himself to
24 liability in a couple of different ways: Possibly as to the
25 facts of this case given that it's not a final conviction and

1 possibly because of the issue of the truthfulness of that
2 particular statement.

3 Even if that's wrong, I have asked well, what would
4 be the hearsay exception if he were allowed to -- if he were
5 not allowed to assert his Fifth Amendment and he testified and
6 he were asked to tell this jury what Mr. St. Michael
7 supposedly said to him. And the answer I was given is that it
8 goes to Mr. Bangarie's state of mind which, of course, is not
9 directly relevant to the defendants in this case.

10 And then the second issue, the second argument is
11 that to some degree, although I don't believe very
12 specifically, it could be consistent with some of the
13 statements that Mr. St. Michael allegedly made to the
14 defendants in this case.

15 It's certainly not identical in any way and I don't
16 believe I heard anybody else testify about the military
17 superiors. I don't recall specific testimony that relied on a
18 badge or military experience, but I certainly can concede in a
19 general sense it's consistent with St. Michael having said
20 that he had some authority, but it's pretty general. It's not
21 specific or precise. And again, we're looking at something
22 fairly removed in the sense of Mr. Bangarie's state of mind
23 which is not relevant. Does it in some small way corroborate
24 the defense testimony.

25 As I say, it's not very probative on that point

1 given the specifics of what was in the proffer and given the
2 specifics of what the defendants have said.

3 I also have to note and this is in connection with
4 the question of whether it would come in under Rule 807. Rule
5 807 requires sufficient guarantees of trustworthiness after
6 considering the totality of the circumstances under which it
7 was made and the evidence, if any, corroborating the
8 statement.

9 A proffer statement not accepted by the Government,
10 not under oath, I don't think has a great deal of
11 circumstantial guarantees of trustworthiness. On top of that,
12 Mr. St. Michael who did testify, denied having made such a
13 statement. The Rule 807 is looking for a statement that is
14 more probative on the point for which it's offered than any
15 other evidence the proponent can obtain through reasonable
16 efforts.

17 Obviously the defendants could obtain and two of
18 them chose to, their own testimony and they called Mr. St.
19 Michael who did not support it, but he's the person that
20 supposedly made the statement to begin with.

21 Again, there's not a lot of authority on that. We
22 have, of course, a somewhat newer version of Rule 807 than it
23 used to be, but I think we're all in agreement on analyzing
24 the principles there.

25 I will note an unpublished opinion from the Fourth

1 Circuit which is U.S. vs. Gomez at 774 Fed Appendix 136. It's
2 a 2019 decision. I can't say it goes into a lot of analysis,
3 but it upholds a decision by former Judge Titus about a
4 statement made to -- well, there was -- a question wanted to
5 be posed to the Government's case agent regarding a
6 co-conspirator's statement made during a trial preparation
7 session. And as it turned out, that particular person did not
8 testify at trial. And the judge denied the efforts to
9 question the Government's case agent which would have been a
10 way to get out that statement. And the Fourth Circuit upheld
11 the judges's decision under Rule 807 to keep that out, noting
12 that the residual exception is to be used very rarely and only
13 in exceptional circumstances. First one being whether there
14 are sufficient guarantees of trustworthiness and I don't find
15 that here.

16 So I think the Fifth Amendment assertion is valid
17 for the reasons I've explained, in which case the only way to
18 get it in would be under Rule 807. I don't believe Rule 807
19 would permit the admissibility of this as a statement with
20 sufficient guarantees of trustworthiness. And if I'm wrong on
21 the Fifth Amendment and he were allowed to be asked about that
22 statement, again, it goes only to Mr. Bangarie's state of mind
23 and I don't think it is sufficiently probative on any other
24 point to outweigh the issues that it brings with it.

25 So I'm going to deny the request to admit that

1 statement made by Mr. Bangarie during the proffer session.

2 With that, is there any other evidence on the
3 defense side?

4 **MR. IVEY:** Not for us, Your Honor.

5 **MR. BENOWITZ:** Your Honor, I just need to consult
6 with Ms. Gavin about any concern she has about the exhibits
7 we're trying to admit.

8 **THE COURT:** Oh, sure. Well, are there some that
9 haven't been offered yet?

10 **MR. BENOWITZ:** No, they were offered, but they're
11 offered for Identification because of the concerns about
12 portions of the plea agreements.

13 **MS. GAVIN:** It was the plea agreements, Your Honor,
14 which the Government is opposed to admitting as under Rule 401
15 and trying to admit extrinsic evidence of impeachment is not
16 allowed. And so we would object to -- I forget which one it
17 is, the one for St. Michael or --

18 **MR. BENOWITZ:** No, it would be for -- I believe I
19 showed both to -- both to Mr. Muma and to Mr. Akem.

20 **THE COURT:** There were certain portions of them.

21 **MR. BENOWITZ:** Correct.

22 **THE COURT:** That were essentially read into the
23 record, I think. I mean --

24 **MS. GAVIN:** We went over those maximum penalties, I
25 think.

1 **MR. BENOWITZ:** Well, I believe with Mr. Muma there
2 were certain portions that I highlighted. I don't have it in
3 front of me, but I did confront him with those portions of
4 both the main plea agreement and the cooperation section of
5 the plea agreement.

6 **MS. GAVIN:** But they weren't impeached, Your Honor.
7 They didn't deny the plea agreements or what they said. They
8 were asked about their understanding of it so, you know, I
9 don't --

10 **THE COURT:** Well, that I don't think -- that's
11 something that we can hash out before the exhibits go back to
12 the jury. You've got them identified.

13 **MR. BENOWITZ:** I do. The only issue is that I would
14 need some time. If there's certain portions that need to be
15 redacted, I would need some time to do that, that's why -- so
16 I can get them into the proper format.

17 **THE COURT:** Well, we're not about ready to send
18 exhibits back. That's fine that you raised it, I'm just
19 saying we don't need to try to resolve that.

20 **MR. BASILE:** The same thing applies to Mr. Nji as to
21 our exhibit which I think I questioned Mr. Muma, he denied and
22 then I used it to try to impeach him and he still denied it.
23 And I think it may be the same document.

24 **THE COURT:** You're still talking about the plea
25 agreement?

1 **MR. BASILE:** Yes.

2 **THE COURT:** That's fine. Again, we can -- it's not
3 something that there is a new exhibit that the jury hasn't
4 heard about, that needs to be offered. We're just talking
5 about what, if any, part of the plea agreement goes back to
6 the jury as an exhibit.

7 **MR. BENOWITZ:** Correct.

8 **THE COURT:** Okay. Do you know if you're going to
9 have any rebuttal?

10 **MS. GAVIN:** One moment, Your Honor. No, Your Honor.

11 **THE COURT:** Okay. All right, so then I'm happy to
12 hear your thoughts. I would think it would make sense
13 essentially to bring the jury back in and have you all rest,
14 subject to checking exhibits.

15 Possibly I have another draft -- I don't think -- of
16 the jury instructions. They're not quite final yet and I'm not
17 sure I've gotten the willful blindness.

18 **MS. GAVIN:** We just submitted the standard. It's
19 just the numbered ones in the front. I didn't understand if
20 Your Honor --

21 **THE COURT:** No, I don't have those in a Word format.

22 **MS. GAVIN:** I'm sorry, I'm happy to send that.

23 **THE COURT:** I need the willful blindness and the
24 accomplice when called by defendant.

25 **MS. GAVIN:** Okay. Thank you, Your Honor, sorry.

1 **THE COURT:** If you could send those. We may be able
2 to gather by around 4:00 or so in the afternoon and review the
3 instructions. Tomorrow we can bring them in in the afternoon
4 at 2 o'clock and it seems to me we can get instructions and
5 the Government's argument and one defense argument in, and
6 then finish the arguments on Thursday morning and get them
7 started deliberating.

8 **MS. GAVIN:** I think that's fine with the Government.
9 I did want to just clarify under the local rules, closing one
10 side -- one hour per party and so for the Government,
11 including rebuttal. But with three defendants' arguments to
12 respond to, I was wondering if there would be any leeway --
13 I'm not really sure -- but just whether if the Court would
14 give the Government any leeway to respond to three different
15 closings.

16 **THE COURT:** I think you are entitled to in total, to
17 somewhat more than an hour given that there are three
18 defendants, you know, maybe an hour-and-a-half total would be
19 enough. I assume that they don't need to --

20 **MS. GAVIN:** Thank you.

21 **THE COURT:** Okay. And I don't know that you all if
22 you need an hour, but you have that time if you need it.

23 Anybody have any other issue, any concern that you
24 want to tell me about? Mr. Benowitz.

25 **MR. BENOWITZ:** Just with respect, with respect to

1 jury instructions, I have some proposals. I'll be sending
2 them to the Court this afternoon. I was just finishing up
3 this morning.

4 **THE COURT:** As soon as you can get them in to me.

5 **MR. BENOWITZ:** Yes, I will.

6 **THE COURT:** And what I have -- that's why it will
7 still be a draft form. I'm thinking we can meet in chambers
8 around 4 and just go through what we've got and then I can
9 finalize it for sure tonight.

10 **MR. BENOWITZ:** And with respect -- yes, and with
11 respect to willful blindness, we would object to that. So I
12 can submit -- I can send an e-mail with sort of a formalized
13 objection with some case law.

14 **THE COURT:** Okay, all right.

15 **MR. IVEY:** Your Honor, is there any chance that we
16 can do the 4:00 remotely? Because I don't have an office here
17 in Baltimore.

18 **MR. BENOWITZ:** Oh, right.

19 **MR. IVEY:** And there's more work I could do in my
20 office.

21 **THE COURT:** Sure. Well, we could -- you could be by
22 phone, you know, speakerphone on the conference.

23 **MR. BENOWITZ:** That's a good point. That would be
24 preferable. I can get to my jury instructions as well that
25 way.

1 **THE COURT:** Okay.

2 **MS. GAVIN:** Your Honor, we would still come to
3 chambers?

4 **THE COURT:** You can still come to chambers. You're
5 close enough.

6 **MR. BASILE:** That's fine. I would prefer the remote
7 also, Your Honor.

8 **THE COURT:** Okay, then we'll have defense counsel on
9 the speakerphone in the conference room and Government counsel
10 can come to the conference room. But what I will try to do is
11 get you -- I will have e-mailed to you all as soon as possible
12 and as soon as I get the willful blindness so that I can plug
13 that in, understanding that it's objected to, but I just want
14 to get everything into the document so that we can then go
15 through it. Okay.

16 **MR. IVEY:** Thank you, Your Honor.

17 **MR. BENOWITZ:** Court's indulgence.

18 **MR. IVEY:** I think we're fine, Your Honor.

19 **THE COURT:** Okay. Then I'm going to call the jury
20 back in and tell them that they're excused until tomorrow
21 afternoon at 2 and what to expect. First I'll let the defense
22 rest.

23 **MR. IVEY:** Do we do that each individually?

24 **THE COURT:** Whatever you prefer. If you would like
25 me to say that I've consulted with defense counsel and

1 everyone rests.

2 **MR. IVEY:** That would be fine with me, Your Honor.

3 **MR. BENOWITZ:** That's fine.

4 **THE COURT:** That's fine?

5 **MR. IVEY:** Yes.

6 **(Jury enters the courtroom at 12:56 p.m.)**

7 **THE COURT:** All right, you can all be seated. All
8 right, so ladies and gentlemen, schedule is always a little
9 bit difficult to predict, but I have been advised that the
10 defense has finished presenting its evidence. Subject to
11 checking exhibits, the defense is resting and the Government
12 is not asking to call anyone in rebuttal. Again, so subject
13 to checking exhibits, all the evidence is done. The testimony
14 is done.

15 That leaves me with various legal matters to finish
16 discussing with counsel and a previous in another case
17 conflict for tomorrow morning. So I'm going to be excusing
18 you for the rest of the day and until 2 o'clock tomorrow.

19 Tomorrow afternoon what will happen is you will hear
20 instructions on the law and we'll get started on counsel's
21 closing arguments. I don't believe that will finish tomorrow
22 afternoon, but so you'll be coming back Thursday morning to
23 hear the rest of the closing arguments, get all the
24 instructions and go out and begin deliberating.

25 So I expect that again, the length of your

1 deliberations is entirely up to you, but I do expect that you
2 will at least begin deliberating on Thursday and then you may
3 finish, you may come back Friday. It will be entirely up to
4 you. And it also depends a little bit on when this all
5 finishes, but that is the schedule as best as I know it right
6 now.

7 The evidence is done. Again, very important, please
8 continue to keep an open mind. Don't talk about the case. You
9 haven't gotten all the instructions on the law yet. You
10 haven't heard the closing arguments. It's very important that
11 you not do any research or talk to folks about the substance
12 of the case until you go out to deliberate.

13 So thank you very much. You are excused then with
14 the usual instructions until tomorrow at 2 o'clock.

15 **(Jury excused at 12:59 p.m.)**

16 **THE COURT:** Okay, I will ask one of my clerks to
17 send you our chamber's number or conference number or
18 something so that you can all call in. I'll get the
19 instructions draft out to you as soon as possible and we'll
20 talk at 4:00.

21 **MS. GAVIN:** Thank you, Your Honor.

22 **(Proceeding concluded at 12:59 p.m.)**

I N D E X

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS.
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ERIC NJI (Continued)

By Mr. Basile:	2			
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By Mr. Mihok:		31		
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5 I, Nadine M. Bachmann, Certified Realtime Reporter
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7 District Court for the District of Maryland, do hereby
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10 proceedings held in the above-entitled matter and that the
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12 of the Judicial Conference of the United States.

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14 Dated this 21st day of June, 2022.

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